15th June 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hamid Saleem (Law Officer) for the respondents present.

Respondent No.4 has submitted written reply/comments which is placed on file. Respondents No.1 to 3 have not submitted written reply/comments. Last chance is given. To come up for written reply/comments on 03.08.2022 before S.B.

(Kalim Arshad Khan) Chairman

03.08.2022

Appellant present in person. Mr. Kabir Ullah Khattak. Additional Advocate General alongwith Mehtab Gul. Law Officer and Asif Nawaz, Assistant for respondents present.

Written reply/comments on behalf of respondents No. 1 to 3 not submitted. Representative of the department sought time to submit written reply on next date. Last chance is given. To come up for written reply/comments on 03.10.2022 before S.B.

 \bigcirc

(Kalim Arshad Khan) Chairman

Form- A

FORM OF ORDER SHEET

Court of	
ase No	391/2022

	Case No	391/2022
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/03/2022	The appeal of Mr. Sahib Kamal resubmitted today by Syed Moman Ali Bukhari Advocate may be entered in the Institution Register and put up
	• •.	to the Worthy Chairman for proper order please. REGISTRAR
2-		This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on $11 - 04 - 2022$
		CHAIRMAN
	11.04.2021	Appellant present through counsel. Preliminary arguments heard. Record perused.
	·o/-	Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections.
i Depo	sited sess fee	The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to
	II wh	respondents for submission of written reply/comments. To
اسر ۱	14/4/22	come up for reply/comments on 15.06.2022 before S.B.
H (I		
		(Rozina Rehman) Member (J)



The appeal of Mr. Sahib Kamal, Assistant Director Education Officer (M) Circle Risalpur, District Nowshera received today i.e. on 03.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

only To

1. Checklist is not attached with the appeal.

- 2. Annexures mentioned in memo of the appeal is not attached with the appeal which may be placed on it.
- 3. Memorandum of appeal may be got signed by the appellant.
- 4. Certificate attached may be got signed by the appellant.
- 5. Affidavit attached may be got attested by Oath Commissioner.
- 6 Four copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 25 /S.T,
Dt. 04/01/2021

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA,
PESHAWAR.

Mo Asi Youse pai Abu.

Sh.

Objections nouse Renn & file re-subnithed.

Copies/set to private Respondent will be provided as admires in of Appeal.

The

Objection No.6 is Still Stand, Therefore, the oppeal is returned to his counsel for its completion and resubmission within 15 days.

No. 677 18.T att. 15-3-12022 Registrar

Sir,

Resorts to objection it is, submotted that the copies of Appeal may be provided after admission of appeal due to huse Number of Respondents in ratrest of Justice.



BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 391 /2022

Sahib Kamal

VS

Education Deptt. etc

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2.	Certificate		07
3.	Affidavit		
4.	Copy of appointment order dated 27.05.2011	A	08-09
5.	Copy of Judgment dated 11.01.2018	B	10-14
6.	Copy judgment dated 12.06.2018	B1	15-16
·	Copy of service rules of management	C	17-19
7.	Copy of seniority list dated 17.08.2018	D	20-29
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APPELLANT

Sahib Kamal

THROUGH:

fair free.

(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN

(SYED NOMAN ALI BUKHARI) ADVOCATE HIGH COURT, (ASAD MEHMOOD)

ADVOCATE HIGH COURT,

& S. Khanz

(SHAHKAR KHAN YOUSAFZAI) ADVOCATE PESHAWAR.





SERVICE APPEAL NO. 301 /2022

Sahib Kamal, Assistant District Education Officer (Male), Circle Risalpur, District Nowshera.

(APPELLANT)

VERSUS

- 1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3. The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 4. The Khyber Pakhtunkhwa, Public Service Commission through its Chairman 2nd Fort Road, Peshawar.
- 5. Muhammad Tahir, ADEO O/o District Education Officer Dir (Lower).
- 6. Farmanullah, ADEO O/o District Education Officer Peshawar.
- 7. Syed Ikram, ADEO O/o District Education Officer Mardan.
- 8. Muhammad Azam Khan, ADEO O/o District Education Officer Bannu.
- 9. Hameed ur Rehman, Assistant Director Directorate of Peshawar.
- 10. Saeed Mehmood, ADEO O/o District Education Officer Buner.
- 11.Fazli Qadir, ADEO O/o District Education Officer Haripur.
- 12. Fahim Jan, ADEO O/o District Education Officer Peshawar.
- 13. Aurangzeb, ADEO O/o District Education Officer Shangla.
- 14. Asadullah Shah, ADEO O/o District Education Officer Bannu.
- 15. Farmanullah, ADEO O/o District Education Officer Swabi.
- 16. Abdul Wahid, ADEO O/o District Education Officer Abbottabad.
- 17. Altaf Hussain, ADEO O/o District Education Officer Malakand.
- 18. Muhammad Alam Din, ADEO O/o District Education Officer Bannu.
- 19. Saleh Bacha, ADEO O/o District Education Officer Lakki Marwat.
- 20. Akbar Ghani, ADEO O/o District Education Officer Dir.
- 21. Muhammad Azim, Assistant Director Directorate of Peshawar.
- 22. Sikandar Hayat, ADEO O/o District Education Officer Swabi.
- 23. Muhammad Noor Sultan, ADEO O/o District Education Officer D.I.Khan.



- 24. Wisal Muhammad, ADEO O/o District Education Officer Charsadda.
- 25. Nisar Ahmad, ADEO O/o District Education Officer Mardan.
- 26.Muhammad Iqbal, ADEO O/o District Education Officer Dir.
- 27. Zaheer Ud Din, ADEO O/o District Education Officer Dir (L).
- 28. Habibullah, ADEO O/o District Education Officer Tank.
- 29. Hafiz Fazli Akbar, ADEO O/o District Education Officer Swabi.
- 30.Mir Samat Khan, ADEO O/o District Education Officer Battagram.
- 31.Muhammad Ishtiaq, ADEO O/o District Education Officer Peshgawar.
- 32. Muhammad Naeem, ADEO O/o District Education Officer Karak.
- 33.S. Anwar Ali Shah, ADEO O/o District Education Officer Charsadda.
- 34.M. Sharif, ADEO O/o District Education Officer Hangu.
- 35. Abdul Qayyum Khan, Assistant Director Directorate of Peshawar.
- 36.Ihsanullah, ADEO O/o District Education Officer Mansehra.
- 37. Habibullah, ADEO O/o District Education Officer Peshawar.
- 38.Muhammad Hayat Khan, ADEO O/o District Education Officer Nowshera.
- 39. Sultan Muhammad Khan, ADEO O/o District Education Officer Mardan.
- 40. M. Ishaq, ADEO O/o District Education Officer Malakand.
- 41. Fiyaz Ud Din, ADEO O/o District Education Officer Dir (L).
- 42. Muhammad Hussain, ADEO O/o District Education Officer Karak.
- 43. Muhamad Asif Khan, ADEO O/o District Education Officer Abbottabad.
- 44. Attaullah Shah, ADEO O/o District Education Officer Swabi.
- 45. Said Zameen Shah, ADEO O/o District Education Officer Malakand.
- 46. Umer Farooq, ADEO O/o District Education Officer Buner.
- 47. Syed Ihsanullah, ADEO O/o District Education Officer Peshawar.
- 48.Imtiaz Ali, Assistant Director Directorate of Peshawar.
- 49. Iftikhar Ali Khan, ADEO O/o District Education Officer Mardan.
- 50.Pir Muhammad Khan, ADEO O/o District Education Officer Dir Upper.
- 51. Sakin Shah, ADEO GHS Urmar Peshawar.
- 52. Iran Gul, ADEO O/o District Education Officer Tank.
- 53 Mushtaa Ahmad, ADEO O/o District Education Officer Kohat.

- 54.Inamullah, ADEO O/o District Education Officer Peshawar.
- 55. Tahir Ahmad, ADEO O/o District Education Officer Lakki Marwat.
- 56.Zahir Qamar, ADEO O/o District Education Officer Mardan.
- 57. Ajeeb Ullah, ADEO O/o District Education Officer Dir Upper.
- 58. Wali Ur Rehman, ADEO O/o District Education Officer Battagram.
- 59.S. Irshad Ali, ADEO O/o District Education Officer Abbottabad.
- 60. Syed Badshah, ADEO O/o District Education Officer Haripur.
- 61. Hafiz Muhammad Ziaullah, ADEO O/o District Education Officer Kohat.
- 62. Abdul Haleem, ADEO O/o District Education Officer Shangla.
- 63.S. Anwar Shah, ADEO O/o District Education Officer Mansehra.
- 64. Roohullah Jan, ADEO O/o District Education Officer Mardan.
- 65. Asmatullah, ADEO O/o District Education Officer D.I.Khan.
- 66. Nasrumin Ullah, ADEO GHS Amangarh.
- 67. Abdullah Khan, ADEO O/o District Education Officer Karak.
- 68. Arshad Mehmood, ADEO O/o District Education Officer Haripur.
- 69.Muhammad Irfan, ADEO O/o District Education Officer Nowshera.
- 70. Wazir Zada, ADEO O/o District Education Officer Mardan.
- 71. Muneeb ur Rehman, ADEO O/o District Education Officer Abbottabad.
- 72. Sajjad Rashid, ADEO O/o District Education Officer Peshawar.
- 73. Noor Ajab Khan, ADEO O/o District Education Officer Karak.
- 74. Bismallah Jan, ADEO O/o District Education Officer Peshawar.
- 75. Muhammad Sadiq, ADEO O/o District Education Officer Mardan.
- 76. Hashim Khan, ADEO O/o District Education Officer Lakki Marwat.
- 77. Muhammad Ishfaq Elahi, ADEO O/o District Education Officer Battagram.
- 78. Sajjad Ahmad, ADEO O/o District Education Officer Charsadda.
- 79.Khalil ur Rehman, ADEO O/o GMS Jati Bala.
- 80. Wajih Ud Din, ADEO O/o District Education Officer Dir Lower.
- 81. Haya Said, ADEO O/o District Education Officer Malakand.
- 82. Sarmast Khan, ADEO O/o PITE Peshawar.
- 83. Aman ul Mulk Shah, ADEO O/o District Education Officer Buner.
- 84. Muhammad Tahir, ADEO O/o District Education Officer Dir Upper.

- 85. Syed Sakhwat Ali shah, ADEO O/o District Education Officer Peshawar.
- 86.Nasrullah Khan, ADEO O/o District Education Officer Dir Lower.
- 87. Janas Khan, ADEO O/o District Education Officer Charsadda.
- 88. Zaheer Ur Rehman, ADEO O/o District Education Officer Hangu.
- 89. Noor Muhammad, ADEO O/o District Education Officer Dir Lower.
- 90.Mukhtiar Khan, ADEO O/o District Education Officer Mardan.
- 91. Shafiq ur Rehman, ADEO Ö/o District Education Officer Abbottabad.
- 92. Zakir Hussain, ADEO O/o District Education Officer Malakand.
- 93. Zahir Shah Khan, ADEO O/o District Education Officer Peshawar.,
- 94. Sajid Ullah, ADEO O/o District Education Officer Charsadda.
- 95. Said Zahid, ADEO O/o District Education Officer Buner.
- 96. Khalid Khan, ADEO O/o District Education Officer Mardan.
- 97. Kiramatullah, ADEO O/o District Education Officer Karak.
- 98. Muhammad Afsar, ADEO O/o District Education Officer Swabi.
- 99. Hamood ur Rehman, Assistant Director Directorate of Peshawar.
- 100. Taj Alam, ADEO O/o District Education Officer D.I.Khan.
- 101. Abdul Karim, ADEO O/o District Education Officer Peshawa.
- 102. Miftah Ud Din, ADEO O/o District Education Officer Chitral.
- 103. Abid Hussain, ADEO O/o District Education Officer Kohat.
- 104. Ijaz Ahmad, ADEO O/o District Education Officer Peshawar.
- 105. Muhammad Ishtaq, ADEO O/o District Education Officer Mansehra.
- 106. M. Arif, ADEO O/o District Education Officer Swabi.
- 107. Zameer Ahmad Khan, ADEO O/o District Education Officer D.I.Khan.
- 108. Shakeel Ahmad, ADEO O/o District Education Officer D.I.Khan.
- 109: M. Saleem, ADEO O/o District Education Officer Peshawar.
- 110. Zafar Khan, ADEO O/o District Education Officer Abbottabad.
- 111. Jehangir Khan, ADEO O/o District Education Officer Charsadda.
- 112. Nisar Muhammad, ADEO O/o District Education Officer Lakki Marwat.
- 113. Zafar Iqbal, ADEO O/o District Education Officer Peshawar.
- 114. Wasim Fazal, ADEO O/o District Education Officer Abbottabad.
- 115. Tahir Shah, ADEO O/o District Education Officer Battagram.

- 116. Abdul Waheed, ADEO O/o District Education Officer, Karak.
- 117. Raees Khan, ADEO O/o District Education Officer Malakand.
- 118. Shams Ur Rehman, ADEO O/o District Education Officer Battagram.
- 119. Syed Fazli Amin, ADEO O/o District Education Officer Charsadda.
- 120. Sharafat Khan, ADEO District Education Officer, Abbottabad.
- 121. Syed Mehmood Ul Hassan, ADEO District Education Officer, Abbottabad.
- 122. Ghulam Jilani, ADEO District Education Officer, Abbottabad.
- 123. Bakht Zada, ADEO District Education Officer, Dir.
- 124. Shams Ur Rehman, ADEO District Education Officer, Mansehra.
- 125. Hamid Rasool, ADEO District Education Officer, Bannu.
- 126. Irshad Khan, ADEO District Education Officer, Peshawar.
- 127. Muhammad Hamyun, ADEO, District Education Officer, Karak.
- 128. M. Anwar, ADEO, District Education Officer, Mardan.
- 129. M. Afsar, ADEO, District Education Officer, Swabi.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT, 1974 AGAINST THE SENIORITY LIST DATED 31.07.2021 OF ADEO'S & ASDEO'S BPS-16 REGULAR MANAGEMENT CADRE MALE. AND ALSO AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90-DAYS.

PRAYER:

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THAT ON THE ACCEPTANCE OF THIS APPEAL IMPUGNED SENIORITY LIST DATED 31.07.2021 MAY BE CORRECTED BY AWARDING CORRECT MERIT POSITION IN THE MERIT LIST WITH ALL BACK BENEFITS. FURTHER THE DEPARTMENT MAY ALSO BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF SDEO'S BPS-17 W.E.F. THE DATE OF MR. MUHAMMAD TAHIR GOT PROMOTED BEING JUNIOR TO THE APPELLANT. WHICH THIS AUGUST ANY OTHER REMEDY TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF THE APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

- 1. That the appellant got appointed as ASDEO on 27.05.2011 and working in District Nowshera on the same post. Copy of appointment orders dated 27.05.2011 is attached as Annex-A.
- 2. That there was tug of war going on between teaching cadre and management cadre employees. The teaching cadre employees were given undue favour and were accommodated on the posts of management cadre. However, certain judgments of this Honorable Court were passed and it was held that the teaching cadre employees shall not hold the post of Management cadre as it would give rise to corruption and corrupt practices. It was elaborately discussed in the initial judgment that these kinds of employees are involved in corruption in Education Department and Mismanagement by the superiors in posting and transfers have collapsed all the departments.
 - 3. That after passing of the judgment, contempt of court petitions as well as writ petitions were filed and in those petitions, it was directed that the posts of Management Cadre and teaching cadre shall be rationalized and the service structure of Management cadre employees shall be framed. Later on, the service rules of management cadre employees employees came into being; however, the teaching cadre employees still hold the posts of Management Cadre employees which have affected their seniority. Copies of Judgment dated 11.01.2018, and judgment dated 12.06.2018 are attached as Annex-B & B1.
 - 4. That as mentioned above, service structure/rules came into being in the year 2018 and fresh seniority list was issued by the respondents on 17.08.2018, however, the errors and issues therein were not rectified by the respondents which were obligatory on the part of respondents and to redress the grievances of those employees whose seniority was affected due to wrong entry in the list. Copy of service rules of affected due to wrong entry in the list. Copy of service rules of are attached as Annex-C & D.
 - 5. That it is important to mention here that a regulation 29(g) which has been imposed by the respondents on the petitioners only got deleted vide notification No. PSC/Regulations/2003 dated 12.02.2011. The regulation 29(g) as deleted is reproduced here as under for assistance of this Honorable Court:
 - 1. One mark shall be deducted for passing an examination in parts or availing additional attempt either in case of failure in one or more than one subjects or improvement of marks or division in any examination. One mark shall be deducted from the candidates who qualify in supplementary from the candidates who qualify in supplementary

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Universities/Institutions who run two Sessions in a year i.e Spring and Autumn, the spring will be considered Annual and Autumn Supplementary. Therefore, one mark will be deducted who qualify in autumn. The deduction ceiling shall be four in the case of professional and three for non-professional posts.

- 6. That the appellant filed appeal for correction of seniority and merit position, on the basis which inquiry committee was constituted vide order dated 09.07.2020 to dig out the real facts. The inquiry officers gave recommendation in favour of the appellant. Copy of the inquiry report is attached as annexure-E.
- 7. That even after inquiry report the seniority position was not corrected by the respondents, so for the said purpose the appellant also approached to Peshawar High court Peshawar but not succeeded. Now the deptt: issued another seniority list wherein seniority position of the appellant is same. The every seniority list give fresh cause of action, so the appellant being feeling aggrieved filed departmental appeal against the same. Which was not responded within statutory period of 90 days hence the present appeal on the following grounds amongst others. Copies of seniority list dated 31.07.2021 and departmental appeal are attached as Annex-F & G.

GROUNDS:

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- A) That the inaction of the respondents by not allowing two marks to the appellant in the merit list under regulation 29 (g) is against the law, facts, norms of natural justice and material on the record.
- B) That appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 & 25 of the Constitution of Pakistan 1973.
- C) That all public powers are in the nature of a trust and public functionaries must act as repository to such trust. In the instant case, the respondents were under legal obligation to process the claim of the appellant as per rules and law but instead of doing the same the respondents issued the final seniority list for the cadre of ADEO's BPS-16.
- **D)** That the respondents acted in arbitrary and malafide manner but not placing the petitioners at the right position in the merit list as well as seniority prepared for the post/cadre of ADEO's BPS-16.
- E) That the respondents violated Article 38(e) of the Constitution of the Pakistan 1973 by not allowing due place to the appellant in the open merit list as well as in the seniority post/cadre of ADEO's BPS-16.

That respondents inspite of knowing the fact that Regulation 29 (g) has been deleted vide Notification dated 12.02.2011 has wrongly and illegally deducted two marks from appellant which caused the appellant badly in the merit list as well as in the seniority list.

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- G) That in the Year 2014 the respondent No. 2 revised the merit list for the cadre of ADEO's BPS-16 wherein many colleagues of the appellant have been allowed their required marks in light of the said deletion of regulation 29 (g) of the rules ibid. that appellant also requested the concerned authorities but of no avail.
- H) That the respondents discriminated the appellant on the subject noted above and as such the impugned merit list and seniority list are not tenable in the eye of law.
- I) That as mentioned in the Department Appeal (Annexed-G) that Muhammad Tahir who have merit position i.e 62/40 marks is junior to the applicant/appellant because of date of birth (age) as per rules 33 clause 2 & 3 of regulation 2003; the said ADEO has been already Notification No. SDEO vide of SO(SM)E&SED/3-2/2018/Promotion of ASDEO BPS-16 to SDEOs post BPS-17 dated 04.09.2019. so the appellant is also entitled to be promoted w.e.f the date of Mr. Muhammad Tahir gets promoted vide Amendments Rule 2017 of Promotion Policy 2009 but it is not possible due to not making correction in appellant's merit position and non providing the actual aggregate score of 62/40 of the appellant by the PSC Peshawar according to the other colleagues whom merit positions were corrected in the revised merit list of 10/02/2014.
 - J) That it is also very pertinent to mention here that in the year 2014 the respondent No. 2 revised the merit list for the cadre of ADEO's BPS-16 wherein many colleagues of the appellant have been allowed their required marks in light of the said deletion of regulation 29(g) of the rules ibid, that appellant also requested the concerned authorities but if no avail. Copies of merit list 2011 and revised merit list is attached as Annex-H & I.
 - K) That the appellant has been condemned unheard and has not been treated according to law and rules.
 - L) That the appellant as mentioned in Paragraph No. 1 were appointed in the month of May, 2011 whereas, the notification of deletion of 29(g) was deleted in the month of February, 2011 and according to the law, notification does not have retrospective effect and have prospective effect, however, in the case of appellant, the delted regulation has been applied on them just to bring them on the bottom of seniority list.

 Copy of Khyber Pakhtunkhwa Public Service Commission Regulations, 2003 is attached as Annex-J.

(M)That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT

Sahib Kamal

THROUGH:

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(M. ASIF YOUSAFZAI) ADVOCATE SUPREME COURT, OF PAKISTAN

(SYED NOMAN ALI BUKHARI)

(ASAD MEHMOOD) ADVOCATE HIGH COURT,

ADVOCATE HIGH COURT,

(SHAHKAR KHAN YOUSAFZAI) ADVOCATE PESHAWAR.

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE	APPEAL	NO.	The second secon	2022
SERVICE	ALLEAD	1101		

Sahib Kamal

Ey,

V/S

Education Deptt. etc.

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

LIT OF BOOKS:

- Constitution of the Islamic Republic of Pakistan, 1973. 1.
- The ESTA CODE 2.
- Any other case law as per need. 3.

THROUGH:

(M. ASIF YOUSAFZAI) ADVOCATE SUPREME COURT, OF PAKISTAN

(SYED NOMAN ÁLÍ BUKHARI) ADVOCATE HIGH COURT,

(ASAD MEHMOOD) ADVOCATE HIGH COURT,

(SHAHKAR KHAN YOUSAFZAI) ADVOCATE PESHAWAR.





BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. _____/2022

Sahib Kamal

VS

Education Deptt. etc.

AFFIDAVIT

I, Sahib Kamal, Assistant District Education Officer (Male), Circel Risalpur, District Nowshera (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this Honorable Tribunal.

DEPONENT

Sahib Kamal

17201-7332958-3





Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Commission, the Competent authority is pleased to appoint the following candidate against the post of Assistant Distt: officer (Male) in BPS-16 (Rs. 6660-470-20160) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Management Cadre on the terms and condition given below with immediate effect.

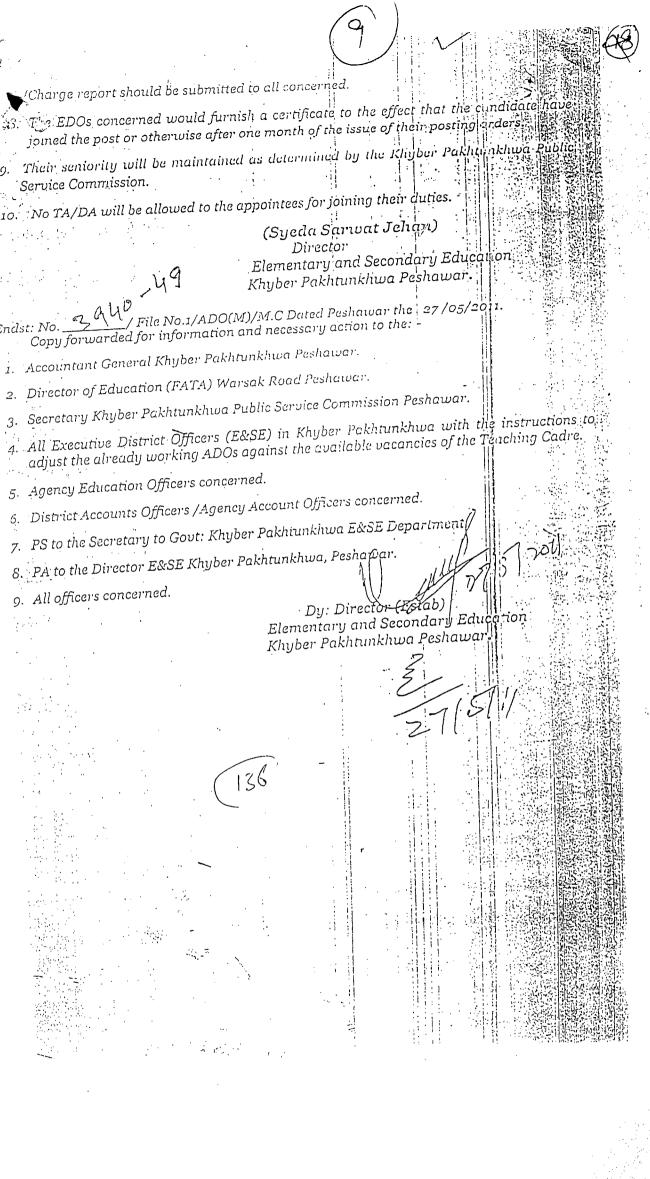
	below with immed	nare egyeen.		1		1-25000
			Domicile	Address		Scrvices placed at the disposal of EDO (E&SE) for further posting
1	Situinis or 222			Mohallah Jhan Baho	np Koroona	Battagram Manschra
2	Sahib Kamal	Haji i dza. Zama		PO Akber pura Distr Nowshehra	.	

Terms and conditions:-

Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as per prescribed by the Gout.

- 1. In case, he is already in Gout: service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to his under his previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to his under new appointment.
- 2. Their services are liable to termination on one month's notice from either side. In of resignation without notice their one-month pay/allowances shall be for feited Government.
- 3. They should join their posts within 30 days of the issuance of this north atton. of failure to join their posts within one month of the issuance of this joint fication appointment will expire automatically and no subsequent appeal etc entertained.
- 4. They would be on probation for a period of one year extendable for another
- 5. They will be governed by such rules and regulations as may be issued time by the Gout.
- 6. Their services can be terminated at any time in case their performation unsatisfactory during probationary period in case of misconduction proceeded against under the NWFP Removal from service (Special pour s) Onli 2000 and the rules framed from time to time!

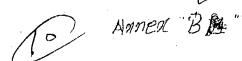




Service Commission.

9. All officers concerned.

Endst: No.



PESHAWAR HIGH COURT, PESHAWAR JUDICIAL DEPARTMENT

W.P No.4274-P/2016

JUDGMENT

Date of hearing......11.01-2018.....

Petitioner: (Ghulam Habib etc) By Mian Mohibullal Kakakhel, Advocate.

Respondents: By Mr. Moeen-ud-Din Hamayun, AAG alongwith Mr. Muhammad Rafique Khattak,

Director, Education.

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OALANDAR ALI KHAN, J.- Ghulam Habib and 21 others, petitioners, challenged notifications with regard to appointment of private respondents from Teaching Cadre as SDEO (BPS-17), which were admittedly Management Cadre Posts.

2. In their writ petition, the petitioners pointed out that on the basis of National Education Policy, 2009, the Elementary & Secondary Education (E&SE)

Department separated Management Cadre from Teaching Cadre vide notification dated 04.05.2009; with nomenclature of Posts of Management Cadre as follows;

 District Education Officer E&SE (DEO BPS-19);

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wp6005 2018 yousaf shah vs PSC usb 133 pags





- Deputy District Education Officer E&SE (DDEO BPS-18);
- Sub-Divisional Education Officer E&SE
 (SDEO BPS-17); and
- Assistant District Education Officer/Assistant
 Sub-Divisional Education Officer E&SE
 (ASDEO/ADEO BPS-16).

The petitioners were appointed as Assistant District Education Officers (ADEOs B-16) on the recommendation of the Khyber Pakhtunkhwa, Public Commission, vide notification 05.05.2011. According to the petitioners, the Government of Khyber Pakhtunkhwa did not frame/issue Service Rules/Service Structure of the petitioners deliberately, thereby trying to derail the system of Management Cadre and issued amended notification dated 07.04.2012 whereby the rules framed in pursuance of Education Policy, 2009, were amended to the extent of making employees of Management Cadre transferable to the Teaching Cadre and vice versa. The said notification dated 07.04.2012 was challenged before this Court in W.P No,3663-P/2012, titled Sultan Mehood Mian..Vs..Government of Khyber Pakhtunkhwa and others, which was accepted vide judgment dated 08.05.2013, thereby declaring the impugned notification dated 07.04,2012

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14>

also judgment of this Court. Anyhow, since the impugned transfers/postings have been made as a stopgap arrangement till postings/appointments of regular SDEOs (BPS-17), according to statement at bar of the Director Education and learned AAG, and process for making provision in the rules with regard to promotions in the Management Cadre is in the final stages, the writ petition is disposed of in the terms that besides finalizing the case for making provision in the Rules with regard to promotions in the Management

Cadre within three months of the receipt of this judgment/order; the respondent/department shall also rationalize postings/transfers against Management

Cadre posts in the light of the relevant rules/policy and

Aunounced <u>11-01-2018</u>

"M.Iqbal"

Hon'ble Mr. Justice Rook-al-Anda Khan Hon'ble Mr. Justice Qalandar All Khan.

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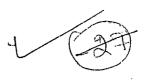
PESHAWAR HIGH COURT PESHAWAR FORM "A"

13 - 1

ORDER SHEET

		Order or other Proceedings with Signature of Judge or that of
TOWAST	Date of Order	Order or other Proceedings with Signature of
ial No. of Order Proceedings	or Proceedings	parties or counsel where necessary 3
1	2	A Committee of the Comm
A STATE OF THE PARTY OF THE PAR	12.06.2018	COC No. 335-P/2018 in WP No. 4274-P/2016.
		Present: Mian Mohib Ullah Kakakhel, Sr. Advocate Supreme Court for petitioners.
		Mr. Moeen Ud Din Hamauyun, AAG alongwith Arshad Khan Spl. Secretary E & SED, Farid Ullah, Director E & SED and Khalid Mateen S.O (Litigation) for respondents.
		* * * * * * * * * * * * * * * * * * *
		ROOH-UL-AMIN KHAN, J. Through instant
• .		contempt of Court petition, petitioners seek
		initiation of contempt of Court proceedings
		against the respondents for non-compliance of
		order of this Court dated 11.1.2018 passed in Wi
		No. 4274-P/2018Latter stated that the service
159		as well as rules have been forwarde
		and approved by the SSRC for sending before the
		Chief Secretary for approval and shall t
		actualized within a week time.
		2. In view of the statement of S







Secretary, learned counsel for petitioners is quiet satisfied and does not want to press this COC which is disposed of accordingly. However, it is expected that the respondents shall honour the statement of Spl. Secretary made before the Court, failing which the law will take its own course.

Announced on; 12th of June, 2018

Judge Judge

J.J.J. JUDGE

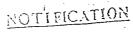
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Zacshad*

DB) Mr. Justice Rooh-Ul-Amin Khan & Mr. Justice Mohammad Nasir Mahfooz

ELEMENTARY & SECONDARY EDUCATION D





Peshawar, duted the July 03, 2018

O(SM) ESSED13-2/2016/SSRC of M.C. In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtimkhwa ice Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of this Department's Notifications No. E&SE/1-76/08/M&T dated 04.05.2009, the Elementary & Secondary Education Department, in consultation with the Establishment riment and the Finance Department, hereby lass down the mothed of recruitment, qualification and other conditions specified in Column 3 to 5 of the Appendix to the Notification which shall be applicable to the posts of Schools Management Cadre in the Directorate of entary & Secondary Education and Directorate of Curricultum & Teachers Education as specified in Column No. 2 of the said Appendix. person a APPENDIX section of the residence of the engineer contract of the section of the sectio

		DA DALLING FOR	Age mine	The second secon
Nontenchature of the Past What 2 Director (BPS-20)	n and Directorate to our appointment or by transfer		4	By promotion, on the basis of seniority-cum-fitness, from amongst the District Education Officers and Additional Directors (Male and Female) with at least five year service in BPS-19 as such and naving successful completion of Senior Management Course! Provided that if no suitable officer is available for promotion then by transfer of BPS-20 officer. Note: For the surpose of promotion, a joint seniority list of District Education Officers and Additional Directors (Male and Female) shall be maintained.

man algan	A CONTROL OF THE PROPERTY OF T	(18)	<u>}</u>	
; r	rici Education Officer/ itional Director (BPS-			By promotion, on the basis of seniority-cui, amongst the Deputy District Education Officers and Directors (Male and Female) with at least seven year service in BPS-18 or twelve year service in BPS-17 and above and having
· · · · · · · · · · · · · · · · · · ·	le and Female)			qualified the Mid-Carcer Management Course:
			25 15	Provided that if no suitable officer is available for promotion then by transfer of BPS-19 officer. (a) Eighty Percent by promotion, on the basis of seniority-cum-
	nety District Education (ii) cer Deputy Director S-18) the and Female)	M.Phil in Education from recognized University with three years teaching or administrative experience in Government recognized educational institutions or offices; or	25 to 45 years	fitness, from amongst the Sub-Divisional Education Officers and Assistant Directors (Male/Female) with at least live year service as such and having qualified eight weeks mandatory training:
		at least Second Class Master's Degree of BS (four years) and Bachelor's Degree of Editablish from Forceaized University with		Provided that if no suitable officer is available for promotion—then by transfer of BPS-18 officer; and
The effects the first war tit		five veers teaching or administrative experience in BPS-17 and above in Government recognized educational institutions or offices: or		(b) twenty percent by initial recruitment.
	(iii)	- Class M.Ed:/M.A. (Education Planning and		
		years leaching or administrative experience in Government recognized educational		
	ficer Assistant Director	institutions or offices. (i) At least Second Class M. VM.Sc or BS (four years) from recognized University: (ii) at least Second Class Bachelor's of	: Zears	cum-fitness, from amongst the Assistant Sub-Divisional Followship Officers and Assistant District Education
	PS-17) elerand Female).	Education from a recognized University and and three years teaching or administrative		Officers (Male & Female) with at least five years service: Provided that if no suitable officer is available for
		experience in Government recognized institutions or offices.		promotion then by transfer of BPS-17 officer; and (ii) Twenty percent by initial recruitment.
	8	e		

sistant Sub-Divisional ecotion Officer/ sistant District ecotion Officer (BPS-) fale and Female)	(four years) (i) at least Se Education f	ond Class Bachelor's Degree of from a recognized University; seemd Class Bachelor's Degree of the seem a recognized University; are aching or administrative expendent recognized institution	ce of and rience 3	By initial recruitment: Provided that if no sui transfer of BPS-16 officer of To	table officer was	
				SECRETARY T	0	
	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		GOVE	ONWENT OF THE KHYBEI	R PAKHTUNKHWA	
			FLEMENTA	RY AND SECONDARY EDU	JCATION DEPARTME	LN I

Il Administrative Secretaries to Govt. of Khyber Pakhtunkhwa. ceretary to Governor, Khyber Pakhtunkhwa. ceretary to Chief Minister, Khyber Pakhtunkhwa. hairman Khyber Pakhtunkhwa Public Service Commission, Peshawar. Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar. Directorate of Curriculum and Teachers Education Khyber Pakhunkhwa Abbottabad. Il District Education Officers (Male/Female) in Elementary & Secondary Education Khyber Pakatunkhwa. Director Information Khyber Pakhtunkhwa Peshawar with the request to give vide publicity. Vanager Government Printing Press Peshawar for publication in the next issue of Govt Gazette. 'S to Minister E&SE Khyber Pakhtunkhwa Peshawar. 'S to Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar. 'S to Special Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar. PS to Additional Secretary E&SE Department, Khyber Pakhtunkawa, Peshawar. PA to Deputy Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar. All Section Officers/Planning Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.



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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR. FINAL SENIORITY LIST OF ADEOs. ASDEOs. (RPS-16) REGULAR MANAGEMENT CADRE MALE IN ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 15-08-2018

			•	•							
	S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
	ı	Ghulam Habib	Muhammad Wali	M.Sc B.Ed.M.Phil	DEO Shangla	1997	. 6.5.1967	M.Agency	12.7.1989	5.20.2011	11
	2	Mehboob Ellahi	Rahmat Elahi	M.A M.Ed	DEO Chitral	1999	3.15.1970	Chitra!	4.10.1995	05.05.2011	
	3	Muhammad Farooq	Gul Rehman		DEO Karak		2.3.1976	K arjak	05.05.2011	05.05.2011	
	4	Abdu! Qayum khan	Haji Lal Khan	M.Sc M.Ed	DEO Abbottabad	1998	4.8.1970	A.Abad	11.1.1995	05.05.2011	
	. 5	Muhammad Zahid Khan	Sher Zaman	M.Sc M.Ed	DEO Nowschra	1998	11.22.1973	Nowshera	6.23.1997	05.05.2011	
	6	Shamsul Islam Niaz	Nizz Muhamınzd	M.A B.Ed	DEO Charsadda	2000	1.1.1978	Charsadda	01.11.2010	. 05.05.2011	
	- 7	Sharafat Khan	Muhamad Aslam Khan	M.A.M.Ed	DEO Abbottabad	1997	5.10.1970	V'Vpaq .	95.05:2011	· 05:05.2011 ·	AND THE RESERVE OF THE PERSON
	8	Mahmood Iqbal	Khairati Khan	MBA M.Ed	DEO(M) D.I Khan	2000	12.1.1967	D1 Khan	1.17.1998	05.05.2011	
	9	Muhammad Irshad	Niaz Farid	M.A B.Ed	DEO Bannu	1999	4.16.1976	FR.Bannu	1.31.2002	05.05.2011	
	01	Muhammad Anwar.	Hazrat Umar	M.A M.Ed	DEO Mardan	2002	3.1.1973	Mardan	6.24.1997	05.05.2011	1713
	11	Zia ullah	Zikriya Khan	M.Sc M.Ed	DEO Peshawar	1994	3.19.1970	Peshawar	5.28.1994	05.05.2011	
	12	Sharns Ur Rehman	Malik ur Rehman	M.A.Edu	DEO Manschra	1999	11.15.1974	Mansehra	1.20.1996	05.05.2011	10/1/2/
1	13	Ifiekhar Ahmad	Mumtaz ahmad	M.A M.Ed	DEO Heripur	1999	12.25.1969	A.Abad	5.E.1993	05.05.2011	of fo ,
	14	Ghulam Sanvar	Gbulam yahya	M.A M.Phil	DEO MKD	1996	5.21.1972	мкр	2.11.1993	05.05.2011	, Nama de
	15	Muhammad Zubair	Sabz Ali Shah	M.A B.Ed	DEO Charadda	2001	7.19.1972	Charsada	1.22.1998	05.05.2011	Alone
	16	Fazli Khuda	Waris Khan	M.A M.Ed	DEO Mardan	2002	1.6.1976	Mardan	3.24.2003	05.05.2011	<u> </u>
	17	Muhammad .Rehman Shah	Gul Rehman Shah	M.A M.Ed	DEO Bannu	2002	2.23.1976	Валли	05.05.2011	05.05.2011	
-		Muhammad Sohail Khan	Mir Jafar Khan	M.A M.Ed	DEO Nowsehra		3.22.1971	Nowshera	10.31.1996	05.05.2011	130 h
	20	Muhammad Naseem	Husnul Maab	M.A M.Ed	DEO Swat	200]	4.10.1975	Swat	05.05.2011	05.05.2011	A ASSA
		Ali adaidar	Bahdar Khan	M.Sc M.Ed	DEO Dir(L)	1991	1.5.1962	Dir	i1.19.1986	05.05.2011	,300
		mad Raza Shah	Muhammad .Hanif	M.A M.Ed	DEO Dir (L)	1991	12.18.1963	Dir	5.11.1983	05.05.2011	



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		- 57									
A PARTY	بر *.5 *.5	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of lst: Apptt; in Education Department	Date of Appti: on ADEO post	Remarks
=			Fatihul Mulk khan	MIA M.Ed	DEO Dir(L)	2003	4.10.1973	Dir	12.20 1994	05.05.2011	
1		Makarumad Islam Dil Nawaz Khan	Dashat Mir	M.Sc M.Ed	DEO Karak	2003	1.3.1977	Karak	8.1.2006	05.05.2011	
Ĺ	!	Filia Muhammad	Firdoos khan	M_A M.Ed.	P.O E&SE	2001	4.15.1977	Swabi	4.20.1999	05.05.2011	
Ĺ			Masal khan	M.S (Edu)	DEO Nowsehra	2004	4.14.1978	Nowshera	6.23.1997	05.05.2011	
-		Muhammad Aftab	Nazeel khan	M.Sc.M.Ed	DEO Peshawar	2004	2.15.1979	Charsada	5.17.2011	5.23.2011	
-		Hayat khan	Jamalud Din	M.A. M.A Edu	DEO Mansehra	1999	1.2.1969	Mansehra	2.28.1993	05.05.2011	· · · · · · · · · · · · · · · · · · ·
į		Muhammad Ajmal	Shad Muhammad	M.A M.Ed	DEO Nowsehra	1995	1.1.1967	Swabi	12.9.1989	05 05.2011	
-		Salih Muhammad	Mazhar Ali Shah	M.A B.Ed	DEO Barmu	1994	1.16.1968	Bannu	3.31.1992	05.05.2011	
-		Weheed Ullah Shah	Malik Muhammad Amir	M.Sc B.Ed	DEO DI Khan	2002	2.28.1976	D I Khan	4.21.1999	05.05.2011	
-		Khalid Naseem	Shahid Khan	M_A M.Ed	DEO Karak	1999	3.5.1970	Karak	10,8.1990	05.05.2011	<u> </u>
		Gei Feraz Abudur Rehman Rashid	Inayat Ullah jan	MLSc M.Ed	DEO Laki Marwat	1,993	1,11.1971	L.Marwat	8.3.1999	05.05.2011	1 1.8
-		Abdul wahab	Abdul Ghafoor	MA.M.Ed	DEO Swabi	1998	3.6.1971	Swabi	12.31.1993	05.05.2011	
:		Imtiaz khan	Taj Barin	M.Phil B.Ed	DEO Nowsehra	1996	2.8.1973	Nowshera	5.30.1995	05.05.2011	XX 8.1,
, 4		Hameed Ullah	Khan Zaman	M_A B.Ed	DEO L.Marwat	2003	4.12.1974	L.Manvai	9.1.2004	05.05.2011	10/10/
1		Muhammad Abid	Fazli Khaliq -	M.A M.Ed	DEO Swabi	2002	11.1.1974	Swabi	4.24.1998	05.05.2011	
:		Mihammed Azam	Badashah Islam	M.Sc M.Ed	DEO Swat	2001	12.27.1974	MKD	05.05.2011	5.10.2011	·
1		Races Kahn	Johar Gul	M.A M.Ed	DEO Khoistan	2000	9.6.1976	Khy: Agency:	9.21.1998	5.23.2011	
1		Adil Muhammad	Ghani Muhammad	M.Sc M.Ed	DEO Mardan	2004	4.3.1979	Swabi	5.7.2011	05.05.2011	1
į		Shah Jehan khan	H.Aslam khan	MLSc M.Ed	Assistant Director	2004	4.15.1979	Peshawar	05.05.2011	05.05.2011	Bronge
1		Love Dan	Amin Jan	M_A B.Ed	DEO Dir(U)	1997	4.2.1972	Baj Agy:	4.19.1995	5.10.2011	
1		Amir Badashah	Tamash Gul		DEO Mardan		4.15.1973	Mardan	05.05.2011	05.05.2011	
	,	Muhammad Hamayun	Salam Gul	M.A M.Ed	DEO Karak	2003	2.2.1973	Karak	10.12.1995	05.05.2011	Assertion Charles
		Artis Wali Khan	Muhammad Yousaf	MLA M.Ed	DEO Swabi	1997	3.5.1971	Swabi	9.21.1997	05.05.2011	King Carlotte and the
Š		Saleem	Abdul Halim	MA.M.Ed	DEO Nowshera	2001	4.25.1972	Nowshera	12,7,1992	05.05.2011	R. S.
44	-			i							

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•		<i>H</i>	·	•							
المنتوا	5.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Appti: on ADEO post	Remarks
			Abdur Rohman	M.A M.Phil (Edu)	DEO Manseina	1998	4.12.1973	ivianseinra	1.31.1795	05.05.2011	
		Shafiq Ur Rehman	Nasrullah	MA.M.Ed	DEO Charsadda	2000	8.17.1974	Charsada	7.13.1997	05.05.2011	
		Ahmad Uliah	Noor Ur Rehman	M.A M.Ed	DEO Mansehra	1993	2.13.1956	Mansehra	3.15.1986	05.05.2011	*
- 1		Races Ur Rehman	Newaz Ali	M.Sc M.Ed	DEO DI Khan	1994	7.25.1969	D J Khan	5.26.1997	05.05.2011	
		Muhammad Zarif	Neor Ali Khan	M.A.M.Phil	DEO Bannu	1998	3.28.1971	Bannu	5.5.1999	05.05.2011	
		Muhammad Tariq		M.A M.Ed		1997	6.2.1974	Вапли	9.1.2006	05.05.2011	
7		Hamid Rasool	Abdur Rasool	M.A M.Ed	DEO L.Marwat	2000	1.3.1974	L.Marwai	5.10.2005	5.10.2011	
		Qadir Shah	Sahib Khan Wadood Ur Rehman	M.A B.Ed	DEO Charsadda	2000	22.01.1974	Peshawar	8.16.1997	5.10.2011	
		Muhammad Arshad		M.A M.Ed	PITE	2003	3.14.1974	Peshawar	5.15.1999	05.05.2011	
٠,	5 4	Irshad Khan	Khushal khan	M.Sc M.Ed	Assistant Director	2001	2.1.1976	Mohd Ay:	05.05.2011	5.10.2011	
	55	Syed Atta Lillah Shah	S.\yed Muzzrab shah	M.A M.Ed	DEO Chitral	2002 -	2.1.1977	Chitral	05.05.2011	05.05.2011	1.8
ď	56	Shahzad Nadeem	Khursheed Ahmad	M.A M.Ed	DEO L.Marwat	1993	9.5.1964	L.Marwat	12.16.1990	05.05.2011	
	57	Habib Ur Rehman	Badashah Khan	M.A M.Ed	DEO Haripur	1998 -	1.1.1970	Manschra	12.19.1990	5.10.2011	10/8/
	58	Abdul Samad	Muhammad Miskeen	W.A W.Ed	DEO Abbottabad	 	5.25.1972	Abbott Abad	05.05.2011	05.05.2011	1,10,1
	59	Chanzeb	Zardad Khan	M.A B.Ed	DEO Mansehra	1999	4.1.1973	Mansehra	05.05.2011	05.05.2011	
	60	Raja Babu Jahangir	Raja Sultan Mubarak	M.A M.Ed	DEO Karak	2000	4.16.1974	FR. Bannu	4.20.1999	5.10.2011	
	61	Qaisor Khan	Muhammad Nawaz Khan	M.A B.Ed	DEO Chitral	1994	2.20.1963	Chitral	3.1.1991	05.05.2011	
	62	Sharaf Uddin	Gul Nadar Khan	M.A M.Ed	DEO Dir(L)	1992	4.8.1968	Dir	5.16.1987	05.05.2011	Aireid
	63	Imtiaz khan	Gul Zaman khan	M.A M.Ed	DEO Dir(L)	1994	1.1.1969	Dir	12.10.1990	05.05.2011	
	64	Muhammad Khitab	Gulab		DEO Dir(L)	1995	4.10.1979	Dir	4.25.1992	05.05.2011	
	65	Bakhi Zada	Mahan Gul	M.A M.Ed	DEO Peshawar	1996	7.15.1972	Peshawar	1.1.1994	05.05.2011	1
	66	Zia ur Rehman	Seid Rehman	M.A M.Ed	DEO MKD	2000	1.1.1973	MKD	05.04.1999	05.05.2011	P = 1 - 1 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -
	67	Ihtisham ul Haq	Fazal Haq	M.Phil(Edu)		1993	4.18.1970	D I Khan	12.31.1997	05.05.2011	to the first of
	68	Muhammad, Saleem	Ghulam Sarwar	M.A M.Ed	DEO DI Khan	1998			1.13.1996	05.05.2011	
	69	Sikander Irlan	Feiz Ullah Khan	M.Sc M.Ed	DEO DI Khan	1998					

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-	س	ff in the second second				тт	 T		Date of Isi:	Desc of		
H	S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Appn: in	Apple on ADEO post	Remarks	
	3	_				1996	3.8.1974	D I Khan	3.1.1993	05.05.2011		
-	70	Apdul Hafiz	Abdur Rashid	M. Sc Ni Fd	DEO DI Khan	2002		A.Abad	6.11.1987	05.05.2011		
ŀ		Ishtiaq Ahmad Khan	M.uhammad kram khan	M.A.M.Ed	DEO Abbottabad			FR.Bannu	05.05.2011	5.12.2011		
-		Mati Ullah khan	Darwaiz khan	M.A M.Ed	DEO DI Khan	2001	4.30.1973	Charsada	2.23.1998	05.05.2011	·	
-		Shehbir Ahmad	Fazle Hanan	M.A M.Ed	DEO Charsadda	2001	1.1.1977	Swabi	1.11.2000	05.05.2011		
		Jamsheed Khan	Mehmood khan	M.A M.Ed	DEO Swabi	2002	3.8.1972	Bannu	4.23.1996	5242011		
		Riaz khan	Mir Zale khan	M.A M.Ed	DEO Bannu	2000	4.15.1970	SW Agy:	10.31.1994	5.19.2911		
			Mir Qadam khan	M.A M.Ed	DEO Bannu	2000	5.14.1972	Dir	8.31.1994	05,05,2011		
		Rajab Ali Muhammad Tahir	Habib Jan	B.Sc M.Ed	DEO Dir(L)	1997	1,1.1975	Peshawar	05.05.2011	05.05.2011		
		Farman Uilah	Aman Ullah	M.a M.Ed	DEO Peshawar	2000	3.15.1975	Mardan	6.24.1997	05.05.2011		
,		Syed Ikram	Syed Mutamed Khan	M.A M.Ed	DEO Mardan	2002	7.18.1977	FR.Bannu	05.05.2011	5.10.2011		d
랑, _		Muhammad Azam Khan	Gul khan	M.A B.Ed	DEO Bannu	2002	4,4,1978	Peshawar	11.7.2005	5.10.2011	1	4
	<u> </u>	Hameed Ur Rehman	Saced Ur Rehman	M.A M.Phil (Edu)	Assistant Director	2000	1.7.1967	Bunir	6.1.1596 -	-05,05,2011.	1-1/18	7
		Saeed Mehmood	Hazrai Mehmood	ba.m.a.m	DEO Buner	- 1995	1	Haripur	9,17,1986	5.10.2011	17/6/	
	<u></u>	Fazle Qadir	Ali Asgher	M.A M.Ed	DEO Haripur	1995	3.15.1969		05.05.2011	05.05.2511		
	<u> </u>		Alif Khan		DEO Peshawar			Shang!a	05.05.2011	05.05.2011		
		Faheem Jan	Paidad khan .	M.A M.Ed	DEO Shangla	1998		Bannu	9.1.1994	05.05.2011	,	
	-	Aurag Zeb Asad Ullah Shah	Nawab Ali Shah	M.A M.Ed	DEO Bannu	. 1994		Swabi	9.1.1992	05.05.2011	Arround	
	86		Afsar Khan	MA.M.Ed	DEO Swabi	1998			05.05.2011	05.05.2011	1 1	
		Farman Ullah Abdul Waheed	Abdul Qadir	M.A M.Ed	DEO Abbottabad			MKD	4,13,1996			
	-		Nasrullah Khan	M.Phill M.Ed	DEO MKD	199		FR. Bannu	-5.26.1999		Protest Disable	:: 11.1"
	١	Altef Hussein	Muhammad Iqbal Din	M.A B.Ed	DEO Bannu	199		L. Marwat	4.23.1996		1	
		Muhammad Alamdin	Lal Badashah	M.Sc M.Ed	DEO L.Marwat	199			3.17.1992		1	
	-	Saleh Badashah	Fatch Muhammad	M.A M.Ed	DEO Dir(L)	199			16.06.200			
		2 Akber Ghani 3 Muhammud Azeem Khan	Naivab Khan	NI.A M.Ed	Assistant Directo	or 199	3.3.1973	INW VE	1			

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٠.			_		••			, who were the		\					•		
•	ئر								Year of	Date	of birth	Domicile	Ar Ed	of lst:	Date of Appit: on ADEO post		Remarks
أنجر		<u> </u>	Name & Designation	Father's name	Q	ualification	Plac	e of posting	B. Ed			Swabi		1.1992	05.05.2011		
1.5	S.#		Name & DOS		MA.N	A Ed	DEO S	idsw	1992	1	20.17	D I Khan	4.	21.1999	05.05.2011		
		ļ		Sadiq ullah			IDEU	D: Kilan	2000			Charsada	5	10.2011	5.10.2011		
1	94		de Heyet	Dilawar Khan		M.Ed	DEO	Charsadda	2604	'	11.1377).15.1992	5.10.201	<u> </u>	
T	95	1	mmad Noor Sultan	Dost Muhammad		.M.Ed		Mardan	1994		.1.170	Baj Agy:		5.05.2011	05.05.201	1	
J	96	Wisa	Muhammad	Fainda Gul		M.Ed	DEO		1993		1.20.170	Dir		7.12.1999	05.05.20	11	
1	97	Nisa	r Ahmad	Baz Mulla		A M.Ed) Din=)	199	3	3.2.1965	Dir	1_	4.1.1993	05.05.20	11	
	98	Mul	ammad Iqbal	Muhammad Saced	М.9	Sc M.Ed			199	6	2.2.1974	Tank	1_	1.21.1997	05.05.20)11	
	9	9 Zah	cerud Din	Muhammad Aslam	M.	A B.Ed		O Tank	200	12	4.5.1978	Swabi	١				
	1		oib Ullzh		M.	A M.Ed		O Swabi	20		5.12.1971	Batgran	0	11.22.1999	05.05.2		
			fiz Fazi e Akbei	Gohar	М	.A M.Ed		O Battagram	30	i -	9.29.1975	Peshav	12:	5.6.1996			
	-	-t	r Samad Khan	Hakeem Khan	M	I.A M.Ed	DE	O Peshwar	_ -	-	5.25.1976			05.05.201			1/1/8
			uhemmac Ishtiaq	Muhammad Latif			DF	EO Karak			11.20.197		Agy	5.13.201			1/8/
				Mumtaz Khan		1.A M.Ed	DI	EO Charsadda			3.1.1970		n	12.3.199			titol
			uhammad Naeem	Syed Mehmood Sha	'	M.A M.Ed	D	EO Hangu		998	3.16.197		u	11.7.200			
		105 S	yed Anwar Ali Shah	Sher khan	1.	M.Sc B.Ed	A	ssistant Director	- 2	000			d Agy:	1.17.19			
	l		Nuhammad Sharif	Abdul Hanan	_1			DEO Mansehra		:997	8.14.197			05.05.20	05.05	.2011	
	Ì		Abdul Qayum khan	Amar sher		M.A M.Ed		DEO Peshawar			12.10.19		vshera	6.23.19	97 05.0	5.2011	
			lhsen ulleh	Muhammád Iqbal				DEO Nowshera		2000	4,14.19			4.29.19	99 05.0	5.2011	gone d.
6	}	109ء	Habib Ullah	Masal khan		M.S (Edu)		DEO Mardan		2004	4.1.19		rdan	10.27.1		5.2011	11
1.	. /	110	Muhammad Hayat Kh≥n	Ali Akber		M.A M.Ed		DEO MKD	-	2901	6.23.19			05.05.		05.2011	6.U
		111	Sultan Muhammad Khan	Muhammad		M.A M.Ed				2004	3.14.1	979 Di		05.05.		05.2011	100
	16	1112	Muhammad Ishaq	Jehan Badashah		M.A M.Ed	· 	DEO Dir (U)		:996	4.14.1		era):			05.2011	
1	4 1	113	Fayaz uddin	Mir Abas Khan		M.A B.Ed		DEO Karak		:996	10.5.	1964 A	bhou Aba			.05.2011	
			Muhammad Hussain	Mir Abas Krian Muhammad Akr	am Khan .	M.A M.Ed		DEO Abbeliab		1991	761		wabi	9.4.		.05.2011	6. 11.
		114	Muhammad Asif Khan			M.A (Edu)		DEO Swabi		1591			IKD	10.10	0.1986 05	1.03.2011	1
			5 Atta Ullah Shah	Ubaid Shah		M.A B.Ed		DEO MKD		1 105.					=	•	
		1	7 Said Zamin Shah	Aqalmin Shali				-									

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10.01.1972. Nowshera

		· _ 			(.				Pag	1No(24)
	-				·		T	Date of Int		
	Name & Designation	; Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of binh	Domicile	Application Education Department	Halvent Apption Hild Front	Remarks
S.#	Name & Stangar			DEO Buner	1994	3.18.1966	Bunir	2.0.1991	11 (14 2011	
1	Umar Faroog	Bahramand \	M.A B.Ed	DEO Peshawar	1996	5.1.1966	Peshawar		(i) ::1 ;::11	
	Syed Ihsan ullah Shah	Sycd Lal Badashah	M.A M.Phil	 		10.12.1966	Peshawar	195.0000	01 01 7011	
<u> </u>		Haji Hayat Gul	M.Sc B.Ed	Assistant Director	1996		Mardan		04 04 2011	
/·	Imtiaz Ali Ifiekhar Ali khan	Zzńf khan	M.A M.Ed	DEO Mardan	1996	5.9.1968	Dir	5.19.1987	D) 114 7011	
121		Nadir khan	M.A M.Ed	DEO Dir (U)	1998	10.4.1969	Peshawar	3.17.1995	ptps 2011	
. L	Pir Muhammad khan	Muhib Ali Shah	M.A M.Ed	GHS Urmar	1997	4.2.1970	Tank	4.6.1999	01/05/2011	
	Sakin Shah	Nascer Khan	M.Sc M.Ed	DEO Tank	1937	12.20.1970	Peshawar	05.05.2011	pt.03/2011	
	Iran Gul	Gulzzr Ahmad		DEO Kohat	1998	1.21.1971	Peshawar	4.10.1994	115 frv 2011	
	5 Mushiaq Ahmad	Taj Muhammad	M.A M.Ed	DEO Peshawar		1.4.1974	L.Mr.vat	2.21.1998	05 05 2011	
_	6 Inam ullah	Rab Nawaz Khan	M.Sc M.Ed	DEO L.Marwai	1999	2.3.1975	Peshawar -	05.05.2011	pt pt 2013	1-1/28-1
	7 Tahir Ahmad	Shemsul gamar	M.Sc B.Ed	DEO Mardan	1999	11.16:1976		05.05.2011	05,05,2011	
	8 Zahir Qamar	Saif ullah	M.A.M.Ed	DEO Dir (U)	2000	1.4.1977	Batgram	05.05.2011	n4 no 2011	
	9 Ajceb ullah	Fojun khan	M.A M.Ed	DEO Battagram	2000	5.9.1977	A.Abad	4.11.1996	ntar; sata	1/0/
-ـا٠	00 Wali ur Rehman	Ali Alsar	M.A MEd	DEO Abbottabad	2000		Swabi	11.26.1986	04 of 2011	
	31 S.Irshad Ali	Ali Ahmad	M.A M.Ed	DEO Haripur	1991	3.1.1965	Kohat	12.4.1985	-1	
	32 Said Badashah	Ajab gul	M.A M.Ed	DEO Kohat	1995	1.1.1967		11.10.1994		- Literature
1	33 Hafiz Muhammad Zia Ullah	Yamin	M.A M.Ed	DEO Shangla	1998			3.26.1990		pur
	34 Abdul Halim	Syed Mardan shah	M.A M.Phil	DEO Manschra	1995			3.24.1992		2
Ţ,	35 Syed Anwar Shah	Misbahuddin	M.A M.Ed	DEO Mardan	1995			11.19.199		A STATE OF
	36 Rooh Ullah Jan		M.A M.Ed	DEO DI Khan	1994			12.10.199		
	137 Asmai ullah	Atta Muhammad	NA MED	GHS Amangar	1994	12.12.19	70 Nowshera	1 (2.10.17)	1 102 103 2011	Tr. Bullin

DEO Karak

DEO Haripur

DEO Nowshera

M.A M.Ed

MA.M.Ed

MA MES

M.A B.Ed

Khan ullah

Zargohan shah

Ghulam Nabi

Mian fazle dayan

138 Nasrumin ullah

Abdullah Khan

Muhammad Irlan

140 Arshad Mehmood

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Pagi-HO(35)

	Name & Designation	Fether's name	Qualification	Place of posting	Year of passing B. Ed	Date of	birth	Domicile	Department	Applit: on ADEO post	Rem.±3S
# ·	Name & Designation			Innoverse	1996	4.15.1	1972 N	Aardan	2.27.1992	05.05.2011	
1		Sahih zada	MA.M.Ed	DEO Mardan	1998	9,10.1	1973	Abbot Abad	3.23.1992	05.05.2011	
	/azir Zaua	Abdul ghafoor	M.A M.Ed	DEO Abbottabad		8.8.1	1970	Peshawar	5.7.1996	5.10.2011	
	funibur Rehman	Abdur Rasheed	M.A M.Ed	DEO Peshawar	2001	6.4.1	1972	Karak	05.05.2011	05.05.2011	
44 S	zjjad Rasheed	Noor Muhammad khan	M.A B.Ed	DEO Karak				Peshawar	7.1.1997	05.05.2011	
145	Noor Ajab khan	Abdul ghafar	M.Sc M.Ed	DEO Peshawar	2000		1974	Mardan	7.16.1997	05.05.2011	
145	Bismillah Jan	Muhammad kamal	MSc.M.Ed	DEO Mardan	2002			L Marwat	5.10.2011	5.10.2011	
147	Muhammad Sadiq	Muhammad Nawaz Khan	M.A.B.Ed	DEO L.Marwat	2001			Peshawar	05.05.2011	5.23.2011	
148	Hashim Khan	Farman Elahi		DEO Battagram		_	0.1976	Charsada	3.10.2007	5.10.2011	
149	Muhammad Ishfaq Elahi	Qazi fazle Hanan	M.Sc M.Ed	DEO Charsadda	2001		3.1977	Peshawar	10.17.1988	05.05.2011	
-	Sajjad Ahmad		M.A M.Ed	GMS Jati Bala	1998		4.1966		8.29.1994	05.05.2011	1,
	Khalil Ur Rehmarı	Hastam khan	M.A M.Ed	DEO Dir (L)	199		11.1967.	MKD	15.02.1990	05.05.201	1
	Wajih Ud Din	Fazal Mahood Jan	M.A M.Ed	DEO MKD	200		24/1905	Mehd Agy:	12.7.1989		
	Haya Said	Mian szid	M.A M.Ed	PITE	- 199		1.1969		5.31.1994		
	Sir Mast khan	Mir Rehman	M.A M.Ed	DEO Buner	199		25.1969		16.08.188		1
155	I was it Chab	Saig Ali Shah	M.A.M.Ed	DEO Dir(U)	19	, ,	.18.1969		10.16.198		11
	Muhammad Tahir	Sawal Fagir	M.A B.Ed	DEO Peshawar	19		.15.1970		05.05.201		11
	7 S.Sakhawat Ali shah	S.Chirgah sheh	M.A.B.Ed	DEO Dir(L)	20	700	1.1.1971		1.14.199		Harris Bras Bras Bras Bras Bras Bras Bras Bra
7	8 Nasrullah khan	Nadar khan	MSc.M.Ed	DEO Charszdda	. 20		2.2.1971		12.16.19		ni pu
1	9 Janas khan	Lal Rahim	M.Sc M.Ed	DEO Hangu	21		2.6.1973		05.05.20		11 6 3
	2 Zahir ur Rehman	Mir hussain	M.A B.Ed	DEO Dir (L)	2		1.2.197		4.11.19	-	011
	51 Noor Muhammad	Said Muhammad	MSc.B.Ed	DEO Mardm	1	-	3.7.197	_			011
1 .	52 Mukhtiar khan	Ismail khan	M.B.A M.Ed	DEO Abbottabao	d. 2		5.25.197		23.04.1		011
	63 Shafiq ur Rehman	Zia ul hag		DEO MKD		2001	2.16.19				
	64 Zakir Hussain	Hussain Gul	M.A B.Ed M.S (Edu)	DEO Nowshera		1999	3.27.19	73 Nowshera	5.28.14	05.55.2	

AVE. Michael

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S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domičíle	Date of Ist: Apptt: in Education Department	Date of Appit: on ADEO post	Remarks
• —		Sardar Khan	MSc.M.L1	DEO Peshawar	2000	4.3.1973	Peshowar	9.25.1993	05.05.2011	
166	Zahir Shah Khan		 	DEO Charsadda	1999	4.30.1974	Mohd Agy	1.1.2001	5.10.2011	
167	Sajid Ullah	Zahir Shah	M.Sc M.Ed			4.1.1975	Bunit	6.20.1993	05.05.2011	
168	Said Zahid	Faiz Mehmood	M.A M.Ed	DEO Buner	2000		Mardan	05.05.2011	05.05.2011	
169	Khalid Khan	Khan Bahdar				4.6.1975	ļ		5.23.2011	
170	Kiramat ullah	Sattar zZman	M.A B.Ed	DEO Karak	1999	4.12.1975	FR Bannu	05.05.2011	05.05.2011	
1	Muhammad Afsar	Hassan Zeb	M.A M.Ed	DEO Swabi	2002	1.5.1976	Śwabi	4.20.1999	 	
<u> </u>		Magbool ur Rehman'	MA.M.Ed	Assistant Director	-2001	5.15.1977	Peshawar	05.05.2011	05.05.2011	
1	Hamood ur Rehman	Sher Alam	M.Sc B.Ed	DEO DI Khan	2002	11.20.1977	FR_Bannu	5,23,2011	5.23.2011	
173	Taj Alam	Jehinger Khan	M.A M.Ed	DEO Peshawar	2003	6.16.1981	Peshawar	223,2007	5.10.2011	
174	Abdul Karim		M.A M.Ed	DEO Chiral	15-93	10.17.1961	Chital	12.29.1984	05.05.2011	
175	Miftah ud Din	Akber khan		DEO Kohat	1998	6.15.1968	Киптатт	10.10.1.995	05.05.2011	
176	Abid Hussain	Hussain Ghulam	M.Sc B.Ed		1,7,70	1,4,1970	Peshawar	05.05.2011	05.05.2011	h / 9/
177	7 Ejaz Ahmad	Ghulam Mohi Ud Din	MA B.Ed	DEO (M) Peshawar	1000	2.15.1970	Mansehra	12.15.1970	-65.05.2011	//
175	Muhammad Ishtiaq	Muhammad Ayub	M.Phil (Edu)	DEO Mansehra	1994			9.19.1995	05.05.2011	101
-	Muhammad Arif	Muhammad Junaid khan	M:Sc M.Ed	DEO Swabi	1997	4.14.1971	Swabi		05.05.2011	—
<u></u>	0 Zamir Ahmad khan	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	1995	4.12.1973	D I Khan	2.15.1996		
-		Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan	2000	5.16.1973	D I Khan	1.14.1998	5.10.2011	<u> </u>
18		Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	1.6.1974	Peshawar	5.19.1994	05.05.2011	Drung.
18		Munawar Khan		DEO Abbottabad		12.25.1974		05.05.2011		6
-	Zafar khan Jehangir Khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	4,15,1975	Peshawar	2.19.1998		
1		Balidar Khan	M.A M.Ed	DEO L.Marwat	1999	11.19.1975	L Marwat	5.15.2002		2000
\vdash	5 Nisar Muhammad	Amir Badashah			1	12.10.197	Peshawar	05.05.201	05.05.2011	A Chi Chi a sangari
_	6 Zafar Iqbal		M.B.A M.Ed	DEO Abbottzbad	1994	6.20.1967	A_Abad	10.1.1985	5.13.2011	16 (2)
18	7 Waseem Fazal	Fazlu Rehman			1993		Mardan	12.1.1987	5.13.2011	Leil Thank
18	S Tahir Shah	Qadar shah	M.A.M.Ed	DEO Battagram	199.			05.05.201	1 05.05.2011	C15. 134.00

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S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of Ist: Appit: in Education Department	Date of Apptit on ADEO post	Remarks
			NI.A MIZG	DEO MKD	1997	08.05.1972	MKD	18.08.1993	05.05.2011	
iĝû	Reccs Knan	Sho Zelian Kilan	M.A M.Ed	DEO Battagram	1994	3.13.1967	Hangu	2.3.1990	5.27.2011	
191	Shams or Rehman	Hafaz Abdul hadi	M.A M.Ed	DEO Charsadda	1997	3.11.1971	Charsada	01.04.1996	05.05.2011	
192	Syed Fazali Amin	Mir Harim Shah		DEO Nowshere	2000	5.11.1972	Novshera	3,22,1992	5.23.2011	
, 193	Sahib Kamul	Haji Fazal Zaman	M.A M.Phil (Edu)	DEO Shangla	2000	ļ <u> </u>	Shangla	1998	05.05.2011	
194	Saecd Ahmad	H.Delber Khan	M.Sc M.Ed	<u> </u>	2002	6.10.1973	Dir	5.1.1999	7.23.2011	
193	Yariq Ahmad	Fazii Rashid	M.A M.Ed	DEO Shangla	2002	7.26.1973	Kohai	4,9,1999	5.13.2011	
196	Muhammad Arshad Sharif	Sharif Khan	M.A M.Ed	DEO Kohat	1995	4.1.1974	SW Agy:	1.29.2002	5.13.2011	
197	7 Ulfat Ali Shah	Defter Shah	M.A B.Ed	DEO DIKhan	1993	1,1,1976	Peshawar	05.05.2011	05.05.2011	•
198	8 Qasim Ali Khan	Mumtez ali khan			100/	6.15.1963	Dir	4,15,1993	05.05.2013	
199	Hidyat ullah	Khan Zada Pacha	M.Sc B.Ed	DEO Dir(L)	1996	ļ —	Mardan	12.22.1994	05.05.2011	,
200	0 Abdul Khaliq	Sultan Menmood	M.A M.Ed	DEO Mardan	1996	4.2.1971		6.21.1992	5,;0,2013	1/ 1/
20	I Abdullah Khan	Sadin Khan .	M.A M.Ed	DEO Hangu	1998	4.25.1970	Kurram	5.2.2011	5.12.2011	11/1/
20:	2 Javaid Igbal	Ghulam Qadar	M.A M.Ed	DEO Mardan .	1999	-3.18.1973	Baj ∧gy	9,24,2003	05.05.2011	10/10/
·	3 Malik Khan	Shehzad Khan	M.A M.Ed	DEO Tank	1996	4.20.19.73	SW Agy:		05.05.2011	(- \ .
20		M'uhzramed Farid Khen	M.A M.Ed	DEO Mansehra	2002	4.5.1974	Mansehra	1.23.1996	05.05.2011	•_
<u> </u>	5 Fazli Subhan	Fazli hanan	M.A M.Ed	DEO MKD	1996	24.02.1965	MKD	15.02.1990	05.05.2011	Miran
<u> </u>	6 Sarfaraz Khan	Shahab Ud Don	M.A M.Ed	DEO Manschra	1992	12.14:1967	-do-	10.11.1994		Wing /
<u> </u>	7 Shahab Ud Din	Fazal Manan		DEO Tank		3.12.1970	NW Agy:	05.05,2011	5.23.2011	(a)
<u> </u>		Muhammad Sher Khan	M.A M.Phil (Edu)	DEO Bannu	2000	3.8.1974	FR.Bannu	10.6.1994	5.10.2011	
. ⊢-	8 Sana ullah	Abdul Qzyum	M.A M.Phil (Edu)	DEO Manschra	2004	1.1.1974	Manschra	2.3.2007	05.05.2011	Assistant Diseasor (L.
· }	9 Nadcem	Darwaish	M.A M.Ed	DEO Manschra	. 1998	10.29.1965	-do-	30.06.1985	05.05.2011	Farmer of the same of Contract
21	0 Ghulam Jilani 1 Syed Mehmood ul Hassan	Syed Sarvar Shah	M.A B.Ed	DEO Abbottabad		20.3.1970	Abbot Abad	05.05.2011	05.05.2011	Mighes of Little State Personal
· }—		Gul Dad Khan		DEO Apportabad		4.15.1973	Vppot Vp3q	05.05.2011	05.05.2011	
	2 Rab Nawaz 3 Jehanzeb Ali	Fang Khan	M.A M.Ed	DEO Charsadda	2000	4.16.1974	Mohd Agy:	05.12.2011	5.12.2011	

- •	J		_	. - -					_		
ا ا								Date of 1st:	Date of		
1		: Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Applit: in Education Department	Apptt: on ADEO post	Remarks	
S.=	Name & Designation .	`			2001	4.12.1972	Mohd Agy;	2.3.2011	10.05.2011	·	
		Malook	141.301.1.04	DEO Charsadda	1999	L	SW Agy:	9.12.2002	5.10.2011		
L	Sange Faras		B54 11.1.24	DEO Tank	 	1.3.1980	FR. Laki	9.5.2002	5.10.2011	<u> </u>	
<u> </u>	Muhammad Ji22	Gul Nazeer	M.Sc B.Ed	DEO L.Manval	2003		FR. Bannu	05.05.2011	05.05.2011		
216	Agil Wazir	Akhya jan			1	4.7.1973	170 20	1			
217	Marouf Khan	ARIYAJAN			-	Š	•			ž.	

CERTIFICATE:

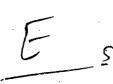
It is certified that the Seniority List is Final, Undisputed and not Subjuidice in any court.

Deputy Director (Estab)

E&SE Khyber Pakhtunkhwa

PESHAWAR

Annex-F





OFFICE OF THE PRINCIPAL GOVT HIGH SCHOOL ZURHAB GUL KILL DISTRICT CHARSADA



То

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

R/Sir

Subject:

Inquiry Report I/R of Mr. Yousuf Shali ASDEO and Sahib Kamal ASDEO District Nowshera under WP.No.6005 and vide No.SO (Lit) E & SED/G-Misc., No.S.O (Lit)

E & SE1-3/2012 and Letter Endst No. 4279-81.

Brief History of the Case:

A letter bearing Endsit; No. 9090-92 dated 09/07/2020 received from your estectmed office to probe into the matter of the subject cited above ASDEOs merit and seniority positions in the light of their submitted appeals to your good office for correction in seniorities. The said ASDEOs have been submitted their appeal in the light of your esteemed office letter vide Endst No. 4279-81, No.SO (Lit) E &SED/G-Misc and No.S.O (Lit) E & SE13 under WP.No.6005.

Procedure/Tools used for conducting inquiry:

The inquiry officers informed the subject ASDEOs to collect their authentic record, evidence, documents within 02 days so that to find out reality and conclusion on the basis of authentic proof in hand. After laps of the said timing both the officers i.e. Mr. Yousaf Shah ASDEO (MC) Cicle Pabbi and Mr. Sahib Kamal (MC) Circle Jallozai were called on for face to face observation/inquiry and securitization of their available authentic record/documents/evidences. Both the officers attended the office of the undersigned along with their available record/documents in time. The inquiry officers (1) Mr. Ahmad Ali Principal and (2) Mr. Abdur Rehman Deputy District Education Officer gone through the available record carefully and also the combined submitted appeal to the honorable director E & SE KOK, Peshawar.

Grounds taken by both the ASDEOs (MC).

- 1. That their last 03 examinations (FA/FSc +BA/BSc+ B.Ed.) score were wrongly calculated during the initial appointment as ADEO/ASDEO and 13 academic marks were wrongly allotted to Mr. Yousaf Shah instead of legal 15 marks, similarly 13 academic marks were wrongly allotted to Mr. Sahib Kamal
- 2. That their experience marks were also allotted wrongly; Mr. Yousaf Shah experience marks were calculated wrongly as 4 marks instead of 5 legal experience marks while Mr. Sahib Kamal experience marks were wrongly calculated as 3 instead of 4 legally experience marks.

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- 3. That both the ASDEOs i.e Yousaf Shah was placed at s.no.187 in the light of w.ongly calculated aggregate score as 60/38 and Sahib Kamal was placed at s.no.227 in the light of wrongly calculated
 - That Yousaf Shah has been descrying to place him at his legal seniority position, with a legal and factual score as 63/38 similarly Sahib Kamal has been deserving to place him at his legal seniority position with a legal and factual score as 62/40

Facts of Merit/Seniority's issue under inquiry:

Yousaf Shah ASDEO;

1. FSc Marks + BSc Marks + B Ed. (Obtaining Marks) Divided by Total Marks

Multiplied by 30

ADEOs' advertisement year 2009, B.Ed. passing year 1999 564+261+512/2550*30= 15:77=15

Total experience 2009-1999=10 years=10 Marks

5 marks excluded as eligibility for the post,

Remaining experience marks 10-5= 5 marks

academic marks + Experience Marks+ M.Ed. (1 marks) +Additional Relevant Total aggregate score =

Qualification marks (Double M.A, 2 marks per M.A) +inter/iew marks

15+.5+1+(2+2)+38=63 Marks/score

Interview marks= 38

Merit position = 63/38

FA Marks + BA Marks + B.Ed. (Obtaining Marks) Divided by Total Marks Multiplied by 30 460+287+534/2550*30= 15.07 counted as 15 in round number as per PSC Rules. Sahib Kamal ASDEO;

ADEOs' advertisement year = 2009, B.Ed; passing year= 2000

Total experience 2009-2000= 9 years= 9 Marks

5 marks excluded as eligibility for the post,

Remaining experience marks 9-5= 4 marks

academic marks + Experience Marks+ M.Ed. (I marks) + Additional Relevant Qualification marks (1

M.A., 2 marks per M.A) +interview marks

15 + 4 + 1 + 2 + 40 == 62 Marks/score

Interview marks= 40

Merit position = 62/40

Main Findings:

1. Mr. Yousaf Shah ASDEO (MC) has been deprived of his legal merit/seniority position in the light of his aggregate score as 63/38 and he was allotted wrongly as 60/38 nggregate score.





- Mr.Muhammad Saleem S/O Ghulam Sarwar having the score of 63/35 is junior than Yousaf shah because of less marks in interview and allotted him seniority No. as 68 in the final seniority list of
- 5/08/2018. Hence Yousaf Shah is deserving for seniority no as 67 legally. Mr. Sahib Kamal ASDEO (MC) has also been deprived of his legal merit/seniority position in the light of his aggregate score as 62/40 and he was allotted wrongly as 59/40 aggregate score.
- Mr. Muhammad Tahir having the same score of 62/40 but junior than Sahib Kamal by date of birth as 14/5/72 and allotted him seniority No. as 77 in final seniority list of 15/08/2018.
- Other colleagues of both the officers were allotted actual/legal merit positions in the light of their academic and experience marks such as 5 marks for passing B.Ed. in the year of 1999 and 4 marks for
- 6. Even a candidate namely Haya said, has been given 01 marks as experience on passing B.Ed. in the year of 2004 and made him senior by allotting him wrongly 60/38 score on S.No.153 score instead of his legal 59/38 merit position which is more junior to both the applicants under inquiry.
- 7. Another colleague of the applicants Mr.Muhammad Rehman Shah academic score comes as 15 but allotted him 18 score with an aggregate score as 65/45 but granted him 66/45 score wrongly.
- 8. Other colleagues of the applicants such as Sharafat Khan, Syed Ikram, Syed Mehmood ul Hassan, Habibullah, Ghulam Jilan, Bakht Zada, Hameedur Rehman, Imtiaz Khan, Shamsur Rehman, Hamid Rasool, Irshad Khan, Muhammad Ishaq, Wisal Muhammad, Imtiaz Ali, Wasim Fazal etc. were allotted their legal and right merit/seniority positions in the light of their submitted appeals.

Conclusion/Inferences:

- 1. Both the officers i.e. Mr. Yousaf Shah ASDEO Circle Pabbi and Mr. Sahib Kanial ASDEO Circle Jallozai were discriminated by not giving them, their right/legal and actual merit/seniority positions.
- 2. Both the officers knocked out so many times the doors of all the competent authorities for granting them their legal merit/seniority positions through formal appeals/correspondence but their appeals were not honored.

The following humble recommendations have been submitted under the rules;

- 1. Mr. Yousaf Shah ASDEO Circle Pabbi (D.O.B. 27/3/73) may please be allotted his actual legal merit position as 63/38, his seniority may also be fixed on S.No. 67 and replaced him senior than Recommendations: Mr.Muhammad Saleem s/o Ghulam Sarwar being junior because of less marks in interview by
 - 2. Mr.Sahib Kamal ASDEO Circle Jallozai (D.O.B. 11/5/72) may please be a lotted his actual legal merit position as 62/40, his seniority may also be fixed on S.No.77 and replaced him senior than Mr.Muhammad Tahir being junior by date of birth (14/05/72) and having the same merit position
 - 3. Both the officers under inquiry may please be promoted according to their mentioned above junior promoted colleagues from the date of their juniors get promoted respectively.

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4. The educational documents of Mr. Yousaf Shah and Sahib Kamal (ASDEOs) may be verified from the concerned institutions after issuing their promotion letters to the posts of SDEOs and formal action may be initiated as per rules in case of any fake or bogus documentation.

References and Supporting Documents;

1. Public Service Commission of KPK Regulation 2003 sub rules 29 and clause (M); Annexed (A) referred to calculation for granting experience to the candidates applied for the posts.

Public Service Commission of KPK Regulation 2003, rules 29 and clause C; Annexed (B) referred to

calculation for granting Academic Marks to the candidates applied for the posts.

3. Public Service Commission of KPK Regulation 2003 sub rules 33 and clause 2 &3; Annexed (C) referred to preparation of merit and for granting seniority position to the candidates applied for the

4. Government of the Khyber Pakhtunkhwa Establishment Department. Regulation wir.g's Notification: No.SO(Policy)/E & AD/1-16/2017 Dated 05/12/2017 AMENDMENTS Rules, Annexed (D) referred

to provide back benefit to the officers who restored their seniority.

5. ADEOs Merit lists of 2011 & 2014 Annexed (E), (F) for allotment of aggregate score and finding out

6. ADEOs Tentative seniority list of 17/07/2018 and Final seniority list of 15/08/2018 Annexed (G)

7. Academic & Professional Documents of those ADEOs whose appeals were accepted and granted them their legal merit positions Annexed H.

Academic & Professional Documents of the applicants under inquiry Annexed I & J for calculation

9. Submitted appeals of the applicants under inquiry Annexed (K) to the competent authorities for

10. Advertisement for the posts of ADEOs Annexed (L) for finding out advertisement date.

quiry Officer-1

Ahmad Ali (Principal)

GNS Zurhab Gul Killi Tangi (Charsada)

Inquiry Officer-11 ABDUR REHMAN (DDEO) District Nowshera

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

TENTATIVE SENIORITY LIST OF ADEOs. ASDEOs (BPS-16) REGULAR MANAGEMENT CADRE MALE IN ELEMENTARY

& SECONDARY EDUCATION KHYBER PAKHTUNKHWA, CORRECTED UPTO 31/07/2021

		& SECONDARY	-DOCATION NITI	DENT PARTITION						
S.#	Name & Designation	Father's name	Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Date of 1st: Apptt: in Education Department	Date of Apptt: on ADEO post	Remarks
		``	N. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	DEO Swabi	1992	11.20.1973	Swabi	9.1.1992	05.05.2011	
1	Sikandar Hayat	Sadiq ullah	MA.M.Ed		2000	2.22.1976	D I Khan	4.21.1999	05.05.2011	
2	Muhammad Noor Sultan	Dilawar Khan	M.A M.Ed	DEO DI Khan	2004		Charsada	5.10.2011	5.10.2011	
3	Wisal Muhammad	Dost Muhammad	MSc.M.Ed	DEO Charsadda	 		Baj Agy:	10.15.1992	5,10,2011	
4	Nisar Ahmad	Painda Gul	M.A M.Ed	DEO Mardan	1994				05 05 2011	·
	Muhammad Saleem	Ghulam Sarwar	MA/M.Ed	DEO DI Khan	1993	18.04.1970	DI Khan	31.12.1997		
5		Faiz Uilah Khan	M.Sc/M.Ed	DEO DI Khan	1998	11.09.1972	DI Khan	13.01.1996	05.05.2011	
6	Sikandar Irfan	Baz Mulla	M.A M.Ed	DEO Dir	1993	11,20,1964	Dir	05.05.2011	05.05.2011	
	Muhammad Iqbal	Muhammad Saeed	M.Sc M.Ed	DEO Dir(L)	1993	3.2,1965	Dir	7.12.1999	05.05.2011	
- 8	Zaheerud Din	Muhammad Aslam	M.A B.Ed	DEO Tank	1996	2.2,1974	Tank	4.1.1993	05.05.2011	
9	Habib Ullalı	Gohar Gohar	M.A M.Ed	DEO Swabi	2002	4.5.1978	Swabi	1.21.1997	05.05 2011	
10	Hafiz Fazl e Akber		M.A M.Ed	DEO Baitagram	2002	5.12.1971	Hatgram	11.22.1999	05.05.2011	
11	Mir Samad Khan	Hakeem Khan	M.A M.Ed	DEO Peshwar	2004	9.29.1975	Peshawar	5.6.1996	05.05.2011	
12	Muhammad Ishtiaq	Muhammad Latif Mumtaz Khan		DEO Karak		5.25.1976	Karak	05.05.2011	05.05.2011	
13	Muhammad Naeem		M.A M.Ed	DEO Charsadda	2002	11,20,1971	Mohd ∧gy	5.13.2011	5.23.2011	
14	Syed Anwar Ali Shah	Syed Melimood Shah	M.A M.Ed	DEO Hangu	1998	3.1.1970	Kuram	12.3.1994	5.10.2011	- Vidin
15	Muhammad.Sharif	Sher khan	M.Sc B.Ed	Assistant Director	2000	3.16.1971	Bannu	11.7.2005	5.23.2011	
16	Abdul Qayum khan	Abdul Hanan	M.A M.Ed	DEO Mansehra	1997	8.14.1971	Mohd Agy	1.17.1995	5.10.2011	
17	Ihsan ullah	Amar sher	W.A. W.Es	DEO Peshawar		12.10.1973	Peshawar	05.05.201	05.05.201	
18	Habib Ullah	Muhammad Iqbal	M.S (Edu)	DEO Noveshera	2000	4.14.1975	Nowshera	6.23.1997	05.05.201	
19	Muhammad Hayat Khan	Masal khan	M.A M.Ed	DEO Mardan	2004	4.1.1978	Mardan	4.29.1999	05.05.201	1
20	Sultan Muhammad Khan	Ali Akber	M.A M.Ed	DEO MKD	2001	6.23.1978	MKD	. 10.27.199	4 05.05.201	1
21	Muhammad Ishaq	Muhammad	M.A M.Ed	DEO Dir (U)	2004	3.14.1979	Dir	05.05.20)	1 05.05.201	!
22	Fayaz uddin	Jehan Badashah	M.A B.Ed	DEO Karak	1996	4.14.1973	Karak .	05 05.201	1 05.05.201	
23		Mir Abas Khan	M.A M.Ed	DEO Abboitabad	1996	10.5.1964	Abbott Abad	05.05.201		
24		Muhammad Akram Khan	M.A (Edu)	DEO Swabi	1991	3.6.1965	Swabi	9,4,1986	05 05 203	1
25	Ana Ullah Shah	Obaid Shah	M.A (Lett)							
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and the second	· ·			1 14 1			- ,				· 	1/1/
and detection in the second	North Control			Place of posting	Year		ate of birth	Dom	icile j	Education	Date of Apptt: on ADEO post	Remarks
Name & Designation	Father's name	Qua	alification	Flace or period	B. 1		3.8.1965	MKD		epartment 10.10.1986	05.05.2011	
		M.A.B.	.Ed I	DEO MKD						2.8.1990	05.05.2011	
id Zamin Shah				DEO Buner				 	var .	11.10.1994	05.05.2011	
				DEO Peshawar	15			+		05.05.2011	05.05.2011.	
				Accistant Director						3.3.1992	05.05.2011	
	Haji Hayat Gul			DEO Mardan		996				5.19.1987	05.05.2011	
	Zarif khan			DEO Dir (U)	1	1996			- J	3.17.1992	05.05.2011	
	Nadir khan			GHS Urmar		1998				4,6,1999	05.05.2011	
	Muhib Ali Shah			DEO Tank		1997				05.05.2011	05.05.201	1
	Naseer Khan	- M.S		DEO Kohat							05.05.201	1
	Gulzar Ahmad					1998	1.21.1971			l	05.05.201	1
	Taj Muhammad					1999	<u> </u>				25.05.201	11
	Rab Nawaz Khan					1999			hawar			11
	Shamsul qamar					2000	11.16.197	76 Dir				
	Saif ullah					2000	1.4.197	7 Bat	ıgram			
	Fojun khan					2000	5.9.197	7 / 1.	∧bad ——————			
Wali ur Rehman	Ali Afsar					1991	3.1.196	5 Sv	vabi		05.05.39	
S.Irshad Ali	Ali Ahmad	M	I.A M.Ed			1995	1.1.196	57 K	ohat			
Said Badashali						1998	4.6.190	68 SI	hangla			
Hafiz Muhammad Zia Ullah		N	A.A M.Ed			1995	3.19.19	069 N	lansehra			
Abdul Halim		N	M.A M.Phil			 	1 (10	70. N	Mardan			
Syed Anwar Shah		1	M.A M.Ed) I Khan			
Rooh Ullah Jan		1	M.A M.Ed				12.12		Nowshera			
S Asmat uliah			M.A M.Ed	GHS Amang	ar				Karak	11.19.		
				DEO Karak			10.01		A.Abad	3.10.1		
				DEO Haripu	ır 					12.9.		5.2011
				DEO Novs	nera							5.2011
- I Isfan				DEO Marda	an				1	ad 3.23.	1992 05.0	5.2011
	Suhib zada			DEO Abbo	ttabad	19				6.7	1996 5.1	0.2011
				DEO Pesha	war		1				5.2011 05.0	05.2011
	Abdur Rasheed			DEO Kara	k	21	001 6.4	.1972				-
25 4)	Nour Muhammad	khan	IVI.A B.I.u								Carrier Carrier (A)	
	d Zamin Shah nar Farooq ed Ihsan ullah Shah ntiaz Ali tekhar Ali khan ir Muhammad khan akin Shah ran Gul Mushtaq Ahmad Inam ullah Tahir Ahmad Zahir Qamar Ajeeb ullah Wali ur Rehman S.Irshad Ali Said Badashah Hafiz Muhammad Zia Ullah Abdul Hatim Syed Anwar Shah i Rooh Ullah Jan 3 Asmat ullah 7 Nasrumin ullah 8 Abdullah Khan 9 Arshad Mehmood 10 Muhammad Irfan 51 Wazir Zada 52 Munibur Re 53 Sajjad Rasheed 54 Noor Ajab khan	d Zamin Shah nar Farooq ed Ihsan ullah Shah haiaz Ali lekhar Ali khan ir Muhammad khan akin Shah Muhib Ali Shah Museer Khan Gulzar Ahmad Inam ullah Taji Muhammad Inam ullah Tahir Ahmad Zahir Qamar Ajeeb ullah Wali ur Rehman S.irshad Ali Said Badashah Hafiz Muhammad Zia Ullah Abdul Halim Syed Anwar Shah Syed Mardan shah Ali Ahmad Ajab gul Yamin Syed Anwar Shah Misbahuddin Atta Muhammad Atta Muhammad Atta Muhammad Atta Muhammad Atta Muhammad Abdullah Khan Abdullah Khan	d Zamin Shah Aqalmin Shah M. A. B. Bahramand M. A. B. Bahramand M. A. B. Syed Lal Badashah M. A. M. M. A. M. Itaiz Ali Itaiz Ali Itaix Ali Haji Hayat Gul Ivi. Se Itaix Ali Khan M. A. M. Itaix Ali Khan M. A. M. Itaix Ali Khan M. A. M. Itaix Ali Haji Hayat Gul Ivi. Se Itaix Ali Khan M. A. M. M. A. M	Agalmin Shah M.A.B.Ed	Agalmin Shah Aqalmin Shah M.A.B.Ed DEO MKD DEO Buner Bahramand M.A.B.Ed DEO Buner Syed Lal Badashah M.A.M.Phil DEO Peshawar Assistant Director Miaz Ali Zarif Khan M.A.M.Ed DEO Mardan DEO Dir (U) Mahammad khan Mahis Ali Shah M.A.M.Ed DEO Dir (U) Mushtaq Ahmad Masser Khan M.S.C.M.Ed DEO Tank Mushtaq Ahmad Masser Khan M.S.C.M.Ed DEO Cank Mushtaq Ahmad M.A.M.Ed DEO Mardan DEO Cank Mushtaq Ahmad M.A.M.Ed DEO Dir (U) Mushtaq Ahmad Masser Khan M.S.C.M.Ed DEO Cank Mushtaq Ahmad M.A.M.Ed DEO Dir (U) Mushtaq Ahmad M.A.M.Ed DEO Mardan DEO Mardan DEO Mardan DEO Mardan M.S.C.B.Ed DEO Mardan M.S.C.B.Ed DEO Mardan DEO Dir (U) Masser Khan M.A.M.Ed DEO Dir (U) Masser Khan M.A.M.Ed DEO Mardan DEO Mardan DEO Mardan M.A.M.Ed DEO Dir (U) Masser Khan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Dir (U) Masser Khan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Mardan DEO Mardan DEO Mardan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Mardan DEO Mardan M.A.M.Ed DEO Mardan DEO Mardan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Mardan DEO Mardan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Mardan DEO Mardan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Mardan M.A.M.Ed DEO Marselu Marar Shah Misbahuddin M.A.M.Ed DEO Marselu Marar Shah Misbahuddin M.A.M.Ed DEO Marselu Marar Shah Misbahuddin M.A.M.Ed DEO Marselu Marar Shan Misbahuddin M.A.M.Ed DEO Marselu Marar Shan Misbahuddin M.A.M.Ed DEO Mardan M.A.M.E	Aqalmin Shah Aqalmin Shah M.A. B.Ed DEO MKD Aqalmin Shah M.A. B.Ed DEO Bunner A. B.Ed DEO Peshawar A. A. M. Phil DEO Peshawar A. A. M. A. M. Phil DEO Peshawar A. A. M. A. M. Ed DEO Mardan A. M. A. M. Ed DEO Dir (U) A. S. B.Ed DEO Tank A. M. B.Ed DEO Contact A. B.Ed DEO Mardan A. M. B.Ed DEO Tank A. B.Ed DEO Dir (U) A. B.Ed DEO Tank A. B.Ed DEO Mardan A. B.Ed DEO Dir (U) A. B.Ed DEO Tank A. B.Ed DEO Mardan A. B.Ed DEO Mardan A. B.Ed DEO Dir (U) A. B.Ed DEO Dir (U) A. B.Ed DEO Mardan A. B.Ed DEO Mar	Agalmin Shah	Agalmin Shah Agalmin Shah M.A. B.Ed DEO MKD 1994 3.18.1966	d Zamin Shah Aqalmin Shah Aqalmin Shah M.A. B.Ed DEO Buner 1994 3.18.1566 Banra Faroq Bahramand M.A. B.Ed DEO Buner 1994 3.18.1566 Peshava 1996 5.1.1966 Peshava 1996 5.1.1966 Peshava 1996 3.4.1968 Maddinan ullah Shah Nagir Khan Nadir Khan Nadir Khan Nadir Khan M.A. M.Ed DEO Dir (U) 1996 5.9.1968 Dir. Haris Shah Muhib Ali Shah M.A. M.Ed DEO Tank 1997 4.2.1970 Tank Maddinan ullah Naseer Khan Naseer Khan M.S. M.Ed DEO Tank 1997 4.2.1970 Tank Maddinan ullah M.A. M.Ed DEO Kohat 1998 1.2.1.1971 Peshavar M.S. M.Ed DEO L'Marvat 1999 1.2.1.1971 Peshavar M.S. M.Ed DEO L'Marvat 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1974 L.M. Tahir Ahnad M.S. M.Ed DEO Mardan 1999 1.4.1977 Bandilah M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 M.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.A. M.Ed DEO Mardan 1995 1.1.1967 N.S. Tahir Ahnad M.	Agalmin Shah Agalmin Shah M.A. B.Ed DEO MKD 1994 3,18,1966 Bunir	Agalmin Shah Agalmin Shah M.A.B.Ed DEO Buner 1994 3.18.1966 Bunir 28.1990 ara Faruoq Bahramand M.A.B.Ed DEO Buner 1994 3.18.1966 Bunir 21.10.1994 ara Faruoq Bahramand M.A.B.Ed DEO Buner 1996 5.1.1966 Peshawar 11.10.1994 ara Faruoq Syed Lah Badashah M.A.M.Phil DEO Peshawar 1996 5.1.1966 Peshawar 05.05.2011 ara Syed Lah Badashah M.A.M.Ed DEO Buner 1996 3.4.1966 Madan 33.1992 ara Syed Lah Badashah M.A.M.Ed DEO Dir (U) 1996 5.9.1968 Nadan 33.1992 ara Syed Lah Shah Madam M.A.M.Ed DEO Dir (U) 1996 5.9.1968 Dir 5.19.1987 ara Syed Madam Mahamand M.A.M.Ed DEO Dir (U) 1996 5.9.1968 Dir 5.19.1987 ara Syed Madam Mahamand M.A.M.Ed DEO Dir (U) 1996 5.9.1969 Peshawar 3.17.1992 ara Syed Madam Mahamand M.A.M.Ed DEO Chalarwar 1998 1.2.1971 Peshawar 05.05.2011 ara Syed Madam Mahamand M.A.M.Ed DEO Chalarwar 1998 1.2.1971 Peshawar 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Chalarwar 1998 1.2.1971 Peshawar 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Dir (U) 2000 1.1.16.1976 Dir 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Dir (U) 2000 1.1.16.1976 Dir 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Dir (U) 2000 1.1.16.1976 Dir 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Dir (U) 2000 1.1.16.1976 Dir 05.05.2011 ara Syed Mahamand M.A.M.Ed DEO Dir (U) 2000 1.1.1.1977 No.1917 No.191	Agalmin Shah Agal

	ng tin ni kanala kaharan jang kanala kan	i garin en	e proposed and the second			· · · · · · · · · · · · · · · · · · ·		· 	Date of ist		96
3º		Father's name	Qualification			Date of birth	Don	nicile	Date of 1st: Apptt: in Education Department	Apptt: on ADEO post	Remarks
	Name & Designation				2000	4.27.1974	Peshav	war	7.1.1997	05.05.2011	
_		bdul ghafar	M.Sc M.Ed	DEO Peshawar	2002 -	4.6.1974	Marda	an	7.16.1997	05.05.2011	
ł	smillah Jan	luhammad kamal	MSc.M.Ed	DEO Mardan	2001	1.15.1975	L Mai	rvat	5.10.2011	5.10.2011	
М	· Codia	tuhammad Nawaz Khan	M.A B.Ed	DEO L.Marwat	-	11.10.1976	Pesha	war	05.05.2011	5.23.2011	
1	ashim Khan	arman Elahi		DEO Ballagram	2001	4 3.1977	Chars	sada	3.10.2007	5.10.2011	
N	Lubammad Ishfaq Elalii)azi fazle Hanan	M.Sc M.Ed	DEO Charsadda	1998	4,14,1966	Pesh	awar	10.17.1988	05.05.2011	
S	aiiad Ahmed	lastam khan	M.A M.Ed	GMS Jati Bala	 	24,11,196			8.29.1994	05.05.2011	
1	rholit i le Rehman	Fazal Mabood Jan	M.A M.Ed	DEO Dir (L)	1998	6/24/190		D D	15.02.1990	05.05.2011	
1,	Vaiih Ud Din		M.A M.Ed	DEO MKD	2004	2 1 100		hd Agy:	12.7.1989	5.23,2011	
1	Haya Said	Mian said :	M.A M.Ed	PITE	1998	255 106			5.31.1994	05.05.201	1
_÷	Cir Mast khan	Mir Rehman	M.A M.Ed	DEO Buner	1999				16.08.1887	5.13.201	1
	Aman ul Mulk Shah	Said Ali Shah	M.A M.Ed	DEO Dir(U)	1998			chawar	10.16.1988	05.05.201	11
1	Muhammad Tahir	Sawal Faqir	M.A B.Ed	DEO Peshawar	1998				05.05.2011	05.05.20	11
	S.Sakhawat Ali shah	S.Chirgah shah	M.A B.Ed	DEO Dir(L)	2000				1.14.1998		11
<u>-</u> -	Nasrullah khan	Nadar khan	MSc.M.Ed	DEO Charsadda	200			narsada —————	12.16.199)11
	Janas khan	Lai Rahim	M.Sc M.Ed	DEO Hangu	200			angu	05.05.201	5 10 20	11
3	Zahir ur Rehman	Mir hussain	M.A B.Ed	DEO Dir (L)	200			aj Agy:	4.11.199	12.05.05	011
59 —-	Noor Muhammad	Said Muhammad	MSc.B.Ed	DEO Mardan	199			lardan	750520		011
70 		Ismail khan		DEO Abbottabad	200	02 5.25.1		bhot Abad	23.04.19		1011
71	Mukhtiar khan	Zia ul haq	M.B.A M.Ed	DEO MKD	20	01 2.16.1	1973 N	лКD -			
72		Hussain Gui	M.A B.Ed	DEO Nowshera	. 19	99 3.27.	1973 N	Vowshera	5.28.19		
73		Abdur Rahim	M.S (Edu)	DEO Peshawar	20	000 4,3.1	1973	Peshawar	9.25.19	6 10 3	
74		Sardar Khan	MSc.M.Ed		19	999 . 4.30.	1974	Mohd Agy	1.1.200		
75	Zahir Shah Khan	Zahir Shah	M.Sc M.Ed	DEO Charsadda			1975	Bunit	6.20.19		
70	Szjid Ullah	Faiz Mehmood	M.A M.Ed	DEO Buner			1975	Mardan	05.05.2		
7	7 Said Zahid	Khan Bahdar					1.1975	FR.Bannu	05.05.2		
7	8 Khalid Khan	Sattar zZman	M.A B.Ed	DEO Karak				Swabi	4.20.1		5.2011
7	9 Kiramat ullah	Hassan Zeb	M.A M.Ed	DEO Swabi			5.1977	Peshawar	05.05.	2011 05.05	5.2011
	Muhammad Afsar	Maqbool ur Rehman	MA.M.Ed	Assistant Direc			20.1977	FR Banni		2011 5.23	3.2011
	81 Hamood up Rajunan		M.Sc B.Ed	DEO DI Khan			6 1981	Peshawar		2007 5.11	0.2011
!	Taj Alam	Sher Alam		DEO Peshawar							
_	83 Abdul Karim	tchinger Khan									A CONTRACTOR OF THE PARTY OF TH

——			 	er mj. e e e			A A			
Ş.		2500			Year of	Date of birth	Domicile	Date of 1st: Apptt: in Education	Date of Apptit: on ADEO post	Remarks
	Name & Designation	Father's name	Qualification	Place of posting	passing B. Ed		Chian)	Department 12.29.1984	05.05.2011 ,	
			M.A M.Ed	DEO Chitral	1993	10.17.1961	Chitral	10.10.1995	05.05.2011	
Mil	fish ud Din	Akber Knan	WI.A WI.LU	DEO Kohat	1998	6.16.1968	Kurram	05.05.2011	05.05.2011	
	'4 II. grain	Hussam Ghulam	W.SC D.Ed	DEO (M) Peshawar		1.4.1970	Peshawar		05.05.2011	
		Ghulam Mohi Ud Din	MA 6.LG	IDEO Mansehra	1994	2.15.1970	Manschra	12 15 1990	05.05.2011	
	Ahinad Alekting	Muhammad Ayub	M.Phil (Edu)	DEO Swabi	1997	4.14.1971	Swabi	9.19.1995		
	uhainmad Ishtiaq	Muhammad Junaid khan	M.Sc M.Ed		1995	4.12.1973	D I Khan	2.15.1996	05.05.2011	
	uhammad Aril	Ahmad Nawaz Khan	M.Sc M.Ed	DEO DI Khan	2000	5,16,1973	D I Khan	1.14.1998	5.10.2011	
Za	emir Ahmad khan	Muhammad Ahmad	M.Sc M.Ed	DEO DI Khan		1.6.1974	Peshawar	5.19.1994	05.05.2011	
SI	nakeel Ahinad	Muhammad Azeem Khan	M.A M.Phil (Edu)		1996	12.25.1974	Abbot Abad	05.05.2011	05.05.2011	
ı liv	uhainmad Saleem	Munawar Khan		DEO Abbottabad	1999	4.15.1975	Peshawar	2.19.1998	05.05.2011	
	afar khan	Shah Jehan	M.A M.Phil (Edu)	DEO Charsadda	1999	11,19,1975	L Marwat	5.15.2002	10.20.2011	
3 3	ehangir Khan	Bahdar Khan	M.A M.Ed	DEO L. Marwat	1997	12.10.1975		05.05.2011	05.05.2011	
4	lisar Muhammad	Amir Badashah				1 22 10/2		10.1.1985	5.13.2011	
5 2	Cafar Iqbal	Faziu Rehman	M.B.A M.Ed	DEO Abbottabad	1994		Mardan	12.1.1987	5.13.2011	
96	Vaseem Fazal		MA.M.Ed	DEO Battagram	1993	<u></u>		05.05.201	05.05.2011	
77	Tahir Shah	Qadar shah	MA B.Ed			1.9.1969	Karak			
	Abdul Waheed	Abdul Ghani		DEOMED	199	7 08.05.197	MKD.	18.08.199	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
		Sher Zaman Khan	M.A M.Ed	DEO MKD	199	4 3.13.196	7 Hangu	2.3.1990		+ 1
	Raees Khan	Hafız Abdul hadi	M.A M.Ed	DEO Battagram	199			01.04.199		1
	Sharas ur Rehman	Mir Hatim Shah	M.A M.Ed	DEO Charsadda	200			3.22.199	5.23.2011	
IC1	Syed Fazali Amm	Haji Fazal Zaman	M.A M.Phil (Edu	DEO Nowshera				1998	05.05.201	1
102	Sahib Kamal	H.Delber Khan	M.Sc M.Ed	DEO Shangla	20			5.1.199	7.23.201	The state of the s
103	Saeed Ahmad		M.A M.Ed	DEO Shangla	20	02		4.9.199	9 5.13.201	
104	Tariq Alımad	Fazli Rashid	M.A M.Ed	DEO Kohat	. 20	7.26.19		1 20 20		1
105	A select Sharif	Sharif Khan	M.A B.Ed	DEO DIKhan	19	95 . 4.1.19	74 SW Agy:	1.27.20		
106	and the state of t	Daftar Shah	IVI.A B.Ed							



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The state of the s					·	1	Date of 1st:	Date of	Remarks
		Qualification	Place of posting	Year of passing B. Ed	Date of birth	Domicile	Apptt: in Education Department	Apptt: on ADEO post	Kemaring
Name & Designation	Fathe sname	Quint		B. Eu	1.1.1976	Peshawar	05.05.2011	05.05.2011	
	Mumtaz ali k an			1006	6.15,1963	Dir	4.15.1993	05.05.2011	
Qasim Ali Khan	Khan Zada P: Jha	M.Sc B.Ed	DEO Dir(L)	1996	4.2.1971	Mardan	12.22.1994	05.05.2011	
Hidyat ullah	Sultan Mehm: od	M.A M.Ed	DEO Mardan	1996	4.25.1970	Kurram	6.21.1992	5.10.2011	
ADdui Khany		M.A M.Ed	DEÓ Hangu	1008	3.18.1973	Baj Agy	5.2.2011	5.12.2011	
Abdullah Khan	Sadin Khan	M.A M.Ed	DEO Mardan	1999		SW Agy	9.24.2003	05.05.2011	
Javaid Ighal	Ghulam Qadi	M.A M.Ed	DEO Tank	1996	4.20.1973	Mansehra	1.23.1996	05.05.2011	
Malik Khan	Shehzad Kha	M.A M.Ed	DEO Mansehra	2002	4.5.1974		15.02.1990	05.05,2011	
Naveco Alimad	M uhammad arid Khan	M.A M.Ed	DEO MKD	1996	24.02.1965		10.11.1994	05.05.2011	·
Fazli Subhan	Fazli hanan	M.A M.Ed	DEO Mansehra	1992	12.14.196		05.05.2011	5.23.2011	
Sarfaraz Khan	Shahab Ud D n		DEO Tank		3.12.1970		10.6.1994	5.10.2011	
5 Shahab Ud Din	Fazal Manan	M.A M.Phil (Edu)	DEO Bannu	2000	3.8.1974	FR.Bannu	2.3,2007	05.05.2011	
7 Sanz ullah	Muhammad Sier Khan	M.A M.Phil (Edu)	DEO Mansehra	2004	1.1,1974		30.06.198	5 05.05.2011	
§ Nadeem	Abdul Qayun	M.A M.Ed	DEO Mansehra	1998				25.06.3011	,,,
	Darwaish	M.A B.Ed	DEC Abbotrabad		20.3.197		26.05.201	05.05.2011	
9 Ghulam Juani 10 Syed Mehmood ul Hassan	Syed Sarwar nah	Mi.A B.Ed	. DEO Abbottabad		4,15.19		06.12.201	10.2011	
	Gul Dad Kha		DEO Charsadda	200			2 - 201	10.05.2011	
	Fariq Khan	M.A M.Ed	DEO Charsadda	200			9.12.200		
2 Jehanzeb Ali	Malook	M.Sc M.Ed	DEO Tank	199	9.10.19	77 SW Agy:	9.5.200	10.2011	
23 Sange Faras	Mir sahib Kh 1	. B.A M.Ed	DEO L.Marwal	200	03 1.3.19		06.05.70		
24 Muhammad Ijaz	Gul Nazeer	M.Sc B.Ed			4.7.19	75 FR. Barn	u 05.05.20		Cofirmed as ASDEO Circle Ak Khuttak, DEO Nowshera by
75 Aqil Wazir	Akhya jan						12/3/	2013 22.08.2016	Programme Notification No 789
26 Maroof Khan		MA/M.Ed	DEO Nowshera		2015 5/16	/1972 Nowsher	12/3/		12 Autod 22/08/2016(Nowshe
127 Iffilher Ahmad	Muhammad I laq	MANNILU							converted into management cac as ADEO(Sports by the Directo
			DEO Mardan		2012 14.10.19	Mardan	15.03.20	01 21.02.201	8 [L&SE Notification No 3405-8 dated 71/07/2018 (Mardan)
!	Hassan Khan	MA/B.Ed	DEO Mardan						A second
特性 / great Khan									

CERTIFICATE

It is certified that the Seniority List is Final, Undisputed and not Subjuidice in any court.

Name & Designation

Father's name

Qualification

Place of posting

Place of posting

B. Ed

Date of birth

Domicile

Apptt: in
Education
Department

Apptt: on
ADEO post
Department

Deputy Director (Estab)

E&SE Khyber Pakhtunkhwa
PESHAWAR

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To

The Secretary E & SE Peshawar, Khyber Pakhtun Khwa

Subject:

Departmental Appeal regarding Correction in Seniority list of ADEOs/ASDEOs by awarding 62/40 Aggregate marks instead of 59/40 Aggregate Score

R/Sir.

With due respect, it is requested in your good self for your kind perusal and favorable consideration as under:

- That the applicant was appointed in the Education Department as PTC teacher on 14/3/1992.
- 2. That later on the appellant along with others was appointed against ADO post (Management Cadre) now designated as ADEO/ASDEO in BPS-16 through the recommendations of Khyber Pakhtunkhwa Public Service Commission vide order dated 27/05/2011 in District Mansehra and then in District Haripur through a corrigendum.
- 3. That your good office has issued the tentative seniority list 2021 of the ADEOs/ASDEOs wherein the name of the appellant has been placed at serial no.102 with Merit Score 59/40 in the merit list of 2011 and revised merit list of 12/2/2014 as well.
- 4. That it came into the knowledge of appellant from the lists of ADEOs/ASDEOs annexed with some of the writ petitions either disposed of or pending before the Honorable High Court that the appellant was awarded the academic marks as 13 instead of 15, due to 2nd attempt in BA & FA Examinations and Two marks have been deducted from the applicant/appellant under Rule 29 (g) of Khyber Pakhtunkhwa Public Service Commission Peshawar.
- That the said rule has already been deleted vide notification No,PSC/Accts/Regulation/2003/4539 dated 12/02/2011, much earlier than the issuance of recommendation and appointment order dated 14/05/2011 and 27/05/2011 respectively, and also before finalization of ADEOs' revised seniority list dated 10/02/2014, which is not applicable upon the applicant in the
- That the said rules were not applied on other colleagues of the applicant some examples are; Muhammad Rehman Shah.
- 7. That some colleagues for instance Mr. Habib Ullah was granted 33 Marks in interview in the Merit list 2011 of ADEOs/ASDEO but made him senior to the applicant by granted him 2 extra marks in interview as 35 and brought his merit position to 62/35 from 60/33 in revised Merit list of 2014, similarly Mr. Wasim Fazal was granted 30 Marks in interview in the Merit list 2011 of ADEOs/ASDEO but made him senior to the applicant by granted him 3 extra marks in interview as 33 and brought his merit position to 60/30 (in revised Merit list of 2014) from 57/30; it is pertinent to mention here that the score of Mr. Wasim Fazal have been wrongly calculated because he falls in the series/order of 30 interview marks like his other two senior colleagues (Attur Rehman & Sahmsul Rehman) whom were also allotted 30 marks each in interview and his correct score can be calculated as 15+7+4+1+30=57/30 but he is allotted wrongly as 60/30.

(3)

8. That the following ADEOs/ASDEOs merit positions were corrected ignoring the applicant/appellant and brought to the top from the bottom by granting them 1 to 3 extra marks in the revised merit list of 10/02/2014 and made them senior to the applicant/appellant (Copies of 2011 & 2014 merit lists enclosed as Annexure A & B).

Name/Father Name	S.NO. (in old "2011" Merit	1 10121	S.NO. (in revised "2014" Merit list)	marks allotted after
	list)	2011 Merit List		correction in revised 2014 Merit list
Sharafat Khan/Muhammad Aslam Khan	34	65/40	8	68/40
Sved Ikram/Sved Mutamed Khan	175	60/40	93	60/35
Sved Mehmood ul Hassan/Syed Sarwar Shah	249	58/38	116	62/35
Habibullah/Muhammad Aslam	217	60/33 56/38	238	58/38
Ghulam Jilan/Darwesh	118	62/38	77	63/38
Bakht Zada/Masham Gul Hameedur Rehman/Saeed ur Rehman	130	61/40	95	62/40
	55	64/38	40	65/38
Imtiaz Khan/Taj Bareen Shamsur Rehman/Malik ur Rehman	29	65/43	15	66/43
Hamid Rasool/Abdur Rasool	77	63/38	61	63/45
Irshad Khan/Khushal Khan	90	62/45	129	61/40
Muhammad Ishaq/Muhammad	176	61/38	112	62/38
Wisa! Muhammad/Dost Muhammad	197	60/38	137.	61/38
Imtiaz Ali/Haji Hayat Gul Wasim Fazal/Fazl ur Rehman	221	Wrong calculated score 60/30; actual		60793
		score comes as		

9. That the following ASDEOs/ADEOs have no record in initial Merit list of 2011 but they were included in the revised merit list of 10/02/2014 (Copies of 2011 & 2014 merit lists already enclosed as Annexure A & B).

Name/Father Name Waheed Ullah Shah/Mazhar Ali	.2011 Merit List)	Total aggregate marks allotted in 2011 Merit List	S.NO (in re 10/2/2014 I list)	Merit	10101	narks/Merit in revised
Shah		<u></u>				

(%)

•					
10 miles 1 mil		15111	101	62/38	
Farman Ullah/Afsar Khan	Nill	Nill ·	126	61/40	
Farman Ollan/Alsar Relati	Nill	Nill			<u> </u>
Habib Ullan/Millianimad 1904.	Nill	Nill	216	59/40	1-2"
Lohir Shan/Claudi Dudi	Nill	Nill	222		
I Torio Annolli deali Rusii.		Nill	226	59/38	
Hidayat Ullah/Khanzada Pacha	Nill		227	59/38	Ī
Abdul Khaliq/Sultan Mahmood	Nill	Nill	221		
Angui Khung Sara			230	59/38	
Javed Iqbal/Ghulam Qadar	Nill	Nill	230		
Javed Iquaii Silan			232	59/38	
Naweed Ahmad /Muhammad	Nill	Nill	70-		
Marveed / min			211	58/35	1
Fareed Khan	Nill	Nill	244		
Maruf Khan/Akhya Jan	1				
	<u></u>				but also m

10. That not only the above mentioned ADEOs were included in revised merit list of 10/2/2014 for the unknown reason but also made them senior to the applicant by granting them high aggregate scores/merit positions.

11. That the following ADEOs/ASDEOs were granted their legal experience marks except the applicant/Appellant but it is pertinent to mention here that some of ADEOs like Muhammad Anwar, Muhammad Afsar, Muhammad Hamayon, Haya Said, were granted surprisingly extra experience marks rather than their legal experience marks, the detail has been shown in the table below; (Copies of 2011 & 2018 merit lists enclosed as Annexure A & C).

S.No.in (2011) Merit	Name of ADEO/ASDEO	Father Name	lation of E Year of Passing B.Ed	Advertisement Year	Total Experience (Marks)	Deducted 5 Marks as Eligibility	Allotted Net Experience by PSC	Legal Marks to be allotted
list/2018 Merit list				2009	2009-1999=10	10-5=5	5	5
4/2	Mehboob Elahi	Rehman Elahi	1999	2009	2009-1999=10	10-5=5	5	55
37/31	Gul Faraz	Shahid khan Raja Sultan	1999 1999	2009	2009-1999=10	10-5=5	5	5
70/60	Raja Babu Jahngeer	Mubarak	- 0.00	2009	2009-1999=10	10-5=5	5	5
99/88	Abdul Waheed	Abdul Qadir	1999	2009	2009-1999=10	10-5=5	5	5
114/89	Altaf Hussain	Nasrullah Khan	1999	2009	2009-1999=10	10-5=5	5	5
202/155	Amanul Mulk	Said Ali Shah	1999	2009	2009-1999=10	10-5=5	4	5
187/165 74/61	Yousaf Shah Qaisar Khan	Abdur Rahim Muhammad Nawaz Khan	1999 2000	2009	2009-2000=09	9-5=4	4	4



4	12	9
()	1	1
		_

							 	
'	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	2000	2009	2009-2000=09	9-5=4	4	4
144/130	Waliur Rehman	Fajun Khan	2000	2009	2009-2000=09	9-5=4	4	4
97/76	Rajab Ali	Mir Qadam Khan	2000		2009-2000=09	9-5=4	4	4.
192/161	Noor	Said Muhammad	2000	2009				
	Muhammad		2000	2009	2009-2000=09	9-5=4	4	44
201/168	Said Zahid	Faiz Muhammad	2000	2009	2009-2000=09	9-5=4	3	4
227/193	Sahib Kamal	Haji Fazal Zaman	2000	2009	2009-2001=08	8-5=3	3	_ 3
17/15	Muhammad	Sabz Ali Shah	2001	. 2007				
• • • • • • • • • • • • • • • • • • • •	Zubair		2001	2009	2009-2001=08	8-5=3	3	3
198/159	Janas Khan	Lal Rahim	2001	2009	2009-2001=08	8-5=3	٦	•
44/37	Muhammad	Badshah Islam	2001	2007		>		3
	Azam		2001	2009	2009-2001=08	8-5=3	3	.,
203/172	Hanood ur	Maqbool ur	2001	2007				3
	Rehman	Rehman	2001	2009	2009-2001=08	8-5=3	3	ر ا
52/45	Muhammad	Abdul Halim	2001				2	2
	Salim	Gul Khan	2002	2009	2009-2002=07	7-5=2	2	
96/80	Muhammad	Gui Kiian	2002				2	2
	Azam Khan	Malik Muhammad	2002	2009	2009-2002=07	7-5=2	1	
32/30	Khalid Naeem	Amir	2002				5	2
		Hazrat Khan	2002	2009	2009-2002=07	7-5=2	3	
13/10	Muhammad	Haziat Khan				7-5=2	3	2
	Anwar	Hassan Zeb	2002	2009	2009-2002=07	1-5-2		
134/171	Muhammad	11035011 200			2002 2003 06	6-5=1	1	1
	Afsar Muhammad	Fatih mulk	2003	2009	2009-2003=06	0-5-1		
27/22	Islam	, a.m.			2000 2003-06	6-5=1	1	1
	Hamidullah	Khan Zaman	2003	2009	2009-2003=06	6-5=1	4	1
47/35	Muhammad	Salam Gul	2003	2009	2009-2003=06	U- J I		
49/43					2000 2004-05	5-5=0	1	0
	Hamayun Haya Said	Mian Said	2004	2009	2009-2004=05	3-3-0		_ \
190/153	науа защ							

^{12.} That the appellant experience score comes as 4 Marks legally like his other colleagues as shown in the above table by passing B.Ed. in 2000 while the department wrongly allotted him 3 marks.

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^{13.} That the Score calculation and merit position of the applicant/appellant, his wrongly allotted merit/seniority position and factual/legal merit/seniority position is discussed in the following table; (Copies of documents are enclosed as Annexure D1 to D7).



Applicant	's score cal	culation a	nd Merit Posit	<u></u>		Academic Score	Net Legal	Wrongly	Correct legal
Detail of Areas, where narks	Qualific ation	Total Marks	Obtaining Marks-	Grand Total of Total-Marks:	Grand Total of Obtaining Marks	According to the Regulation 2003	Score	allotted Merit/seni ority position	Meril/seniority position to be alloted
Hotted by PSC under Regulation 2003						=Grand Total obtaining divided by Grand total multiplied by 30			
Academic	FA	1100	460	1100+550+900= 2550	160+287+53 I- 1281		15 instead of wrongly 13 (see merit list	59/40 (see revised	62/40 D.O.B 11/05/1972
Score (3 last examinations	ВА	550	534		·		on page 08 s.no.227	merit list 10/2/2014 page 06	Falls in seniority on s.no.91 in revised Merit list
, 	B.Ed	900	334				40 correct	s.no.	2014, being senior to
Interview Score								Or Initial	Muhammad Tahi who has the same
MA	2 mark	s have bee	en given per M	aster degree; 1 Mast	er degree = 2 mark	is .	2 correct 1 correct	Merit list 2011 on	score 62/40 with D.O.B=14/5/72;
M.Ed	1 marks	s has been	given on M.E	d degree; M.Ed = 1 r	narks		4 instead of	S.No.227	The applicant seniority may be fixed on s.no.77
Experience	B.Ed ir	2000 s have be	en given on ea = (09 marks b	ch year; advertiseme ut 05 marks deducted	nt was in 2009 I as eligibility, ren	naining=04 marks)	wrongly 03	1	in Final seniority of 15/8/2018 according to
Total Legal							4 = 62 Mark 59	S	merit list of 201 & may be
Wrongly all	otted score						3		promoted to SDEO like his junior colleague
Difference									Junior coneague

(45)

14. That as mentioned in column no.10 of the above table that Mr. Muhammad Tahir who has the same merit position i.e.62/40 marks but is junior to the applicant/appellant by date of birth as per rules 33 clause 2 & 3 of regulation 2003: the said ADEO has been already promoted to the post of SDEO vide Notification NO.SO(SM) E & SED/3-2/2018/Promotion of ASDEO (BS=16) FO SDEOs (BS=17) promoted to the post of SDEO vide Notification NO.SO(SM) E & SED/3-2/2018/Promotion of ASDEO (BS=16) FO SDEOs (BS=17) and dated the September 04, 2019: So the applicant is also entitled to be promoted w.e.f. the date of Mr. Muhammad Tahir gets promoted vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant's vide AMENDMENTS Rule 2017 OF PROMOTION POLICY 2009 but it is not possible due to not making correction in applicant is also entitled to be promoted with the possible due to not making correction in applicant is also entitled to

15. That in tentative seniority list of 2021, some colleagues were included by the office of worthy Director E & SE as MC Officers (ADEOs/ASDEOs) at s.no.127 and s.no.128; therefore, the appeal of the applicant may also be accepted accordingly please.

In the light of the mentioned above factual grounds, it is, humbly requested that the appeal of the applicant/appellant may very kindly be accepted and the name of the appellant may be placed in right place in the seniority list by awarding 15 marks legally as academic instead of 13 accepted and the name of the appellant may be placed in right place in the seniority list by awarding 15 marks legally as academic instead of 13 marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and place him on seniority no.77 in the marks and 4 experience marks instead of 3 marks with the merit aggregate score as 62/40 rather than 59/40 and 59/40 and 59/40 and 59/40 and 59/40 and 59/40 a

With best regards I am!

Yours obediently

Sahib Kamal ASDEO Circle Jalloża District Nowshera

Cell # 0316-9467797/ 3449996930

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	152.	Saxin Shalis/Oiliumbalishah	; 15	5	.5:2	; · · · · .		33.	61	(5)
69		Irran Ali S/O Gohar Ali -	-17-	.2	4			38	- 51	
` '	154:	Rooff Ullah Jan S/O Misbah-ud-Dih	17	. 6. ,	. 2 .			35	51	
79,1		Haliz M. Zizullah S/O Ajab Guj	12	6 -	4.,	1	3	35	61	
5		Arshad Mehmood S/O Ghulam Nati	17	5	2	1		35	61	•1 :
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	160.	Abdul Aleem S/O Yasin	- 18	5	2	1	* . *	35	61	
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101	, ,	M.4qbal S/O Bazmula	14	. 8	4		[==	. \35\.	б1	
76	165.	Jahangir Khan S/O Shah Jahan	17.	. 4	`4			35.	61	400
	167:	M. Irfan S/O Mian Fazal Dayan	17	4	4	1	7	. 35	-51/	
13	163.	Abdullah Khan S/O Zarghun Shan	16	7 😤	. 2	3	2	35 	51	
	169.	Asmatuilah S/O atta Muhammad	16	7	2	1		35	. 61	
195	(170/	S:Anwar Shah S/O S.Mardan Shah	. 15	6.	4	1		35 •	61	
122	1	M. Sadiq S/O M.Kamal	. 16	1.	· <u>.</u> 2	1	• 	40	60.	S S
169		SAjid Ahmad S/O Qazi Fazie Hassan	17.	1 1	₹ · 2	-	• 	40 -	. 60	1
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56	190.	Haya Sald S/O Mian Said		. (17.	1	- 4	-	- 4	38	60	
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127 -64	197.	Imtiaz Ali S/O Haji Harat Gul		. 14	7		1		38	- 60	
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53	203.	Hamood ur Rehman S/O Magbool ur Rehman			3.	2.		^	138 ÷ 1	60	
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54	205.	Haq Nawaz S/O Ahmad Khan		14	5	1 - 4			35	60 -	3
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2001 / Zefer Ali Khan
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(Deputy Secretary-III)

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Auner-1 KHYBERPUKHTUNKHWA. PUBLIC SERVICE COMMISSION 2 Fort Road, Peshawar Cantt, (Near Governor House)

PH No. 9213563 9213750,9214131

Fax No. 921 1795 No. PSC-/ 1 19367 No. PSC-/_

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To

The Secretary to

Govt of Khyber Pakhtunkhwa

Elementary & Secondary Education Department

PROVISION OF MERIT LIST OF A.D.O (B-16) IN E& SED.

I directed to refer to your letter No:SO (S) 3-2/09 Req: Dated 16.05.2009 Subject: on the subject noted above and to forward the revised inter-se merit of Male A.D.O (B-16) for your record and necessary action please.

or your	record ar	id necessary		
				District
	· .	D.O Birth	Name with Father name	
Merit	Total	D.O.Birin		Peshawar/2
Order-	Marks	20.72	Waqar Khan S/o Sifat Ullah	Moh:Agy/1
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2.	69/45	05.06.67	Ghulam Habib S/o Rahmat Iiahi Mehboob IIahi S/o Rahmat Iiahi	Karak/4
	69/45	15.03.70	Mehboob IIahi S/o Raithat Hebendari Muhammad Farooq S/o Gul Raman Muhammad Farooq S/o Haji Lal	Abbottabad/5
3.	69/45	03.02.76	Muhammad Farooq S/o Gui Kair Abdul Qayyum Khan S/o Haji Lal	Acocom
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6.	68/45	22.11	Shams ul Islam Niaz S/o Niaz	Charsadda/2 ·
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7.	68/45	01:01.78	Muhamad	Abhottabad/5
1	1 :		Muhamad Sharafat Khan S/o Muhammad	
8.	68/40	10.05.70	Aslam Khan	D.f Khan/4
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Your obediently

(Ilyas Shah)

Deputy Secretary-III

Annex-J





PUBLIC SERVICE COMMISSION KHYBER PAKHTUNKHWA REGULATIONS, 2003

UPDATED UPTO October 2012

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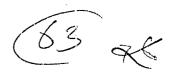




Khyber Pakhtunkhwa Public Service Commission

Regulations 2003

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¹[KHYBER PAKHTUNKHWÅ] PUBLIC SERVICE COMMISSION

NOTIFICATION 15th December, 2003.

Notification No. ²<u>KP/PSC/31550</u>. In exercise of the powers conferred by Section 10(A) of the ³[Khyber Pakhtunkhwa] Public Service Commission (Amendment) Ordinance, 2002 (4[Khyber Pakhtunkhwa] Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

PART - I

GENERAL

- These Regulations may be called the ⁵[Khyber Pakhtunkhwa] (a) 1. Public Service Commission Regulations, 2003.
 - They shall come into force at once. (b)
- In these Regulations, unless the context otherwise requires: -
 - "Attached Department" means the department as defined in (a) the ⁶[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
 - "Appointing Authority" means the officer or authority (b) designated as such in the Service Rules framed by the government for the post.
 - "Commission" means the ⁷[Khyber Pakhtunkhwa] Public (c) Service Commission.

The word "NWFP" substituted with words "KHYBER PAKHTUNKHWA" vide the Khyber Pakhtunkhwa Law (Amendment) Act. 2011.

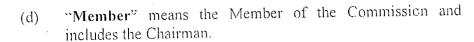
² The word "NWFP" substituted with word "KP" vide the Khyber Pakhtunkhwa Law (Amendment) Act. 2011.

The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act. 2011.

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⁶ The word "NWFP" substituted with words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.



- "Department" means as department as defined in the (e) ⁸[Khyber Pakhtunkhwa] Government Rules of Business. 1985.
- "Departmental Representative" means the senior officer of (f) the department of the government to which post/s relates and who assists the Committee / Panel of the Commission for conducting the viva-voce / interview.
- "Subject Specialist" means the advisor called for interview (g)by the Commission from the University / Colleges / Institutions / Autonomous Bodies / Retired Officer directly or through the Head of Department.
- "Government" means the Government ⁹[Khyber (h) Pakhtunkhwal.
- "Committee" means the Committee of one or more Members (i) constituted by the Chairman for any specific task.
- "Panel" means the interviewing Panel of one or more (i) Members of the Commission constituted by the Chairman to conduct viva-voce / interview for selection to the specified posts.
- "Requisition" has the same meaning as in Rule 13 of the (k) ¹⁰[Khyber Pakhtunkhwa] Civil Servants (Appointments, Promotion and Transfer) Rules, 1989.
- "Requisition Form" means the requisition form as prescribed (1)by the Commission.
- "Test" has the same meaning as assigned to it in Rules 3 and (m) 6 of the 11 [Khyber Pakhtunkhwa] Public Service (Functions)

⁷ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁸ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber

Pakhtunkhwa Law (Amendment) Act. 2011.

The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011. •



Rules, 1983 and includes Screening Test, Aptitude Test, General Knowledge Test, Subject Test (related to post and qualifications) or any other test.

(n) In "Parts" means passing an examination in more than one attempt or Supplementary Examination or Autumn Examination of University or Board where two courses are run in a year and also includes improvements where the candidate makes additional attempt for the improvement of his division or marks in an examination.

The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

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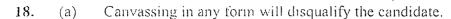
PART - II

REQUISITIONS

- 3. Only the requisition furnished on the prescribed form shall be entertained. The requisition shall be signed by the Administrative Secretary or the Additional Secretary of the Department in respect of posts in BPS-17 and above while posts in BPS-16 and below shall be singed by the Head of attached Department and accompanied by: -
 - Zonal Allocation worked out strictly in accordance with the Zonal Allocation Formula notified by the S&GAD vide No. SORI (S&GAD)3-39/70 dated 03.02.1990 and zonal rotation cycle circulated by the Commission vide No. 3-89-DS/3241 dated 19.03.1990 or in accordance with the other instructions of the Government as issued from time to time.
 - (b) Printed or notified copy of the service rules relevant to the post to which recruitment is to be made, particular of academic qualification, experience, sex and age limit prescribed under the relevant rules.
 - (c) In case the rules have not been notified, the Commission shall examine the requisition in accordance with the draft rules as approved by the Rules Sub-Committee and the Commission.
 - (d) Where service rules do not exist, guidance may, if considered necessary, be obtained from the suggested rules of the department and if there is no such rules, the service rules existing for the similar post in the same department or another department or another provincial / federal government will be taken into consideration.
 - (e) Job description and job analysis of vacancies or any other instruction of the government issued from time to time shall also accompany the requisition.
 - (f) The requisitioning authority shall also provide Certificate to the following effect:
 - (i) That the requisition has been examined and is complete in all respects.
 - (ii) That no other requisition has been sent to the Commission for this vacancy / these vacancies.







- (b) The candidate may be disqualified and / or excluded from any examination, test or interview for any post held or to be held by the ¹⁷[Khyber Pakhtunkhwa] Public Service Commission in future and / or criminally prosecuted / debarred from employment under government if he/ she:
 - (i) Knowingly furnishes any particular which is false;
 - (ii) Suppresses material information;
 - (iii) Attempts to influence the Members of the Commission, the officers and officials of the Commission, Advisors and Departmental Representative called to assist the selection panel in the interview;
 - (iv) Attempts to obtain support for his / her candidature by improper means;
 - (v) Submits forged certificates;
 - (vi) Tempers with the entries in his / her age and academic certificates;
 - (vii) Misbehaves in the examination hall;
 - (viii) Is found guilty of misconduct during examination;
 - (ix) Fails to observe the instructions issued by the Commission with regard to written test / examination;
 - (x) Uses unfair means in the test / examination.

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¹⁷ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

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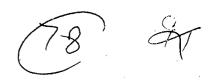
PART - V

20. <u>Citizenship / Domicile Certificate / Photograph.</u>

- (a) Only those candidates will be held eligible who are citizens of Pakistan and possess a domicile of ²⁰[Khyber Pakhtunkhwa].
- (b) The candidates shall invariably attach National Identity Card as a token of possessing citizenship. In case National Identity Card is not produced, the candidate will explain the reasons of its non-availability with authentic proof for having applied to the concerned authority for its issuance but it was not issued till date.
- (c) The candidates shall attach the domicile certificate which had been issued to them by the competent authority before the last date fixed for receipt of applications. No alteration in the entries with regard to domicile certificate shall be accepted subsequently. Domicile once produced shall be final.
- (d) If it is proved that a candidate has produced fake domicile at the time of his / her selection, disciplinary action will be taken against such candidate including cancellation of his / her candidature / selection.
- (e) A female candidate if married before entry into government service shall acquire the domicile of her husband. If otherwise she will possess her own domicile.
- (f) The candidates both male / female will have to attach three attested passport size photograph with their applications. The purdah observing females can be exempted from the requirement of photograph if she attaches an affidavit with her application to the effect that she never produced her photograph in any Board / University Examination. In such case she will have to produce three attested signatures.
- ²¹(g) Category "B" domicile of Mohmand Agency shall be accepted only if the following requirements are fulfilled: -

²⁴ Clause (g) inserted vide Notification No. PSC/ PA/ Reg/03 dated 13.04.2004.

²⁰ The word "NWFP" substituted with the words "Khyber Pakhtunkhwa" vide the Khyber Pakhtunkhwa Law (Amendment) Act. 2011.



- (i) Confirmation/ re-attestation of his / her domicile certificate by Political Agent.
- (ii) An affidavit to the effect that the holder of Category "B" domicile of the Agency has renounced his/ her domicile of settled District and produces proof thereof from the Collector of the District concerned.



PART - VI

COMPETIVE EXAMINATION / WRITTEN TEST/ SHORTLISTING BY THE ACADEMIC RECORD / CALL UP NOTICES / ²²[INTERVIEW]

- 21. Subject to the requisitions Competitive Examinations shall normally be held once in a year in respect of the following posts:-
 - (a) Provincial Management Service/ Deputy Superintendent of Police/ Section Officers / Excise and Taxation Officers (PMS Officers/ DSP/ SO/ ETOs)
 - (b) Civil Judge-cum-Judicial Magistrate.
 - (c) Naib Tehsildar.
 - (d) Assistant Sub-Inspector of Police.
- 22. Minimum qualifying marks in each subject and aggregate shall be as laid down by the government.
- i) In all direct recruitment cases if disproportionate number of applications are received as against the number of available vacancies, the Commission shall hold one of the following tests in order to bring the candidates to a manageable level for interview:
 - a) Subjective type Screening Tests;
 - b) General Knowledge Test;
 - c) Ability Test in the relevant subject/ field
 - d) Psychological Test

Where no such test is held, shortlisting can also be made on the basis of such academic and / or professional record of the candidates as the Commission may decide to take into consideration.

i) Where for certain posts the number of candidates is very small or few, in such cases the chairman shall decide whether direct interview shall be held.]

²² The word "/ INTERVIEW" inserted vide Notification No.PSC/ Accts/ Regulations/ 2003/12441-70 dated 26.02.2009.





²⁵[The Chairman shall decide the nature of the ²⁴(a) screening test keeping in view the qualification and experience prescribed for the post. The Chairman, if he deems appropriate or necessary, he may solicit the opinion of a committee of Members that he may constitute for the purpose]. Admission letter will contain the detail in respect of date, time, centre and nature of the test alongwith other necessary instructions. On receipt of result a merit list of all the candidates shall be drawn. The top ten candidates on the merit list shall be called for interview against a post reserved for merit while five candidates per post shall be called against zonal post. In the case of higher number of available vacancies both for merit and zones, the Commission may reduce the ratio of shortlisting and decide the same on case-to-case basis. Ordinarily, zonal shortlisting will be linked to the number of available vacancies in a particular zone.

24.

Those candidates shall be called for disabled seats who are in possession of a certificate issued by the Board of Rehabilitation of disabled persons stating their disability.

- Screening Test or Ability Test results should be compiled or completed in all respects within two months. In case of complications or disproportionate number of candidates are involved in a particular result, approval of the Chairman PSC for relaxing the target date must be obtained.
- All candidates appearing for competitive examination will be allowed three chances for each individual examination while four 25. chances will be allowed in combination of different competitive examinations.
- Where the candidate remains absent in the competitive examination his chance will remain intact. However, if he appears in any one 26. subject he / she will be deemed to have availed the chance.
- In direct recruitment cases other than the competitive examination, the candidates will have three chances of physical appearance for 27. interview for posts having one and the same qualification and pay scale. In case he fails all the time he shall be ineligible. However, if

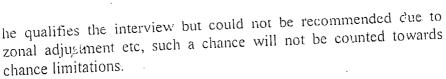
2003/12441-70 dated 26.02.2009.

²⁴ Regulation 24 renamed as Regulation 24 (a) vide Notification No.PSC/ Accts/ Regulations/

^{2003/12441-70} dated 26.02.2009.
²⁵ First Sentence of Clause (a) of Regulation 24 substituted vide Notification No. KPSC/ B&A-52/ 2003/ 24561-72 dated 12.03.2014

26 Clause (b) of Regulation 24 inserted vide Notification No.PSC/ Acets/ Regulations/





- Call notices shall be issued under registered cover to all eligible candidates as far as possible fifteen days before the ²⁷28. interview. However, where a Competitive Examination or screening test is to be held such notices may be assued through ordinary mail twenty-one days before the start of examination. The date of examination shall also be notified in the press.
 - ²⁸[(b) The Director Recruitment should ensure that urgent requisitions are prioritized for early scheduling of interview thereof. Interview schedule for next month should be prepared by the first week of every current month.
 - ²⁹[Results in which the number of candidates or recommendees is small should be finalized on the same (c) day as the interviews are concluded. Results involving larger number of candidates should be completed within a maximum of four days of the finalization of interviews. The approved results or recommendations of the communicated Commission should be department concerned by the Director or the Officer concerned if the Director is on leave.]

2003/12441-70 dated 26.02.2009.

Clause (c) of Regulation 28 substituted vide Notification No. KPSC/ B&A-52 / 2003/ 24561-72 dated 12.03.2014

²⁷ Regulation 28 renamed as 28(a) vide Notification No.PSC/ Accts/ Regulations/ 2003/12441-70\

dated 26.02.2009.

²⁸ Clause (b) and (c) of Regulation 28 inserted vide Notification No.PSC/ Acets/ Regulations/



PART - VII

MARKING SYSTEM FOR POSTS FILLED ³⁰[BY] OTHER THAN SYLLABUS BASED COMPETIVE EXAIMATIONS.

29. (a) Marking in the case of posts filled other then prescribed syllabus based examination will be made out of 100 marks to be distributed between the academic achievements of the candidates and the interview as follow:

		30 Marks
i)	Academic Record Distinction for standing first in Board/	02 Marks
ii)	University	
iii)	Hifz-ul-Ouran	03 Marks
iv)	Additional Relevant Qualification	02 Marks
v)	Higher Relevant Qualification	03 Marks 10 Marks
vi)	Experience	50 Marks
vii)	Interview	JO IVIAIRS

- (b) Minimum passing standard in the interview is 60%. In case experience is not a laid down qualification for any category of posts, the 10 marks allocated for experience shall be added to interview marks.
- (c) Academic scoring in respect of professional posts shall be based on the last three or four professional examinations, as the case may be, on the basis of percentage to 30 marks reserved for academic record and not on division wise basis. For example, if a candidate obtains 2150 marks out of 3650 marks out of a total three or four professional examination his credit will come to 17.67 marks out of 30. So in such cases, the candidate will be entitled to 18 marks.
 - (d) In the case of non-professional posts, last three board or university examinations shall be taken into account. In the case of lecturer the marks obtained in Intermediate, Bachelor and Masters Examinations will be taken into account.
 - (e) Decimal fraction of 0.5 and above shall be considered one mark while less than that shall be ignored. To elaborate, a candidate securing 19.5 marks shall be considered to have secured 20 marks.

³⁰ The word "BY" inserted vide Notification No. PSC/ Accts/ Regulations/ 2003/ 4539 dated 12.02.2011.





- In cases where aggregate marks of different boards / universities are at variance conversion of marks shall be made (f) both in the case of aggregate and secured marks of the candidates so as to maintain equity and uniformity in the calculation of overall score of the candidate.
- ³¹Deleted. (g)
- In cases where basic qualifications for the post are either intermediate or bachelor degree only last two or three (h) examinations 32[including] Matriculation shall be taken into account.
- In cases where the candidate fails to provide the proof of secured marks in a particular examination, he shall be deemed (i) to have passed in parts and with the lowest passing marks.
- ³³[Distinction marks shall be allowed only for standing first in the last/ final University / Board examination prescribed for (j) the post. The entitlement of distinction marks shall be further subject to the condition that the examination was passed by obtaining 60% (Grade-B) and above marks.
- ³⁴[The marks reserved for additional relevant qualifications shall be awarded at the rate of one mark for each additional (k) relevant Diploma or Degree. Similarly, the marks reserved for higher relevant qualification, shall be awarded at the rate of one mark for each higher relevant Diploma or Degree. However, for Doctorate of Philosophy (Ph.D) and equivalent qualifications, three marks shall be awarded. If the additional qualification is only a repetition of the original qualifications, no additional marks will be given.]

Explanation. A candidate having MA English from Peshawar University will not be given additional marks for MA English from Punjab University. The table below indicating the countable additional relevant qualifications to different subjects shall apply mutatis mutandis.

³¹ Clause (g) of Regulation 29 deleted vide Notification No.PSC/ Acets/ Regulations/ 2003/4539 dated 12.02.2011.

The word "after" substituted with the word "including" substituted vide Notification No. KPSC/ B&A-52 / 2003/ 24561-72 dated 12.03.2014.

33 Clause (j) of Regulation 29 substituted vide Notification No. KPSC/ B&A-52 / 2003/ 24561-72 dated

First sentence of Clause (k) of Regulation 29 substituted vide Notification No. KPSC/ B&A-52/ 12.03.2014 2003/ 24561-72 dated 12.03.2014





Subject of Advertised Post

Additional Relevant Subjects

Islamic Culture / Islamiyat. Islamic Culture / Islamic History Arabic

Arabic-cum-Islamiyat Mathematics, Physics.

Commerce/Economics/Statistics / 35[IMBA] Astronomy Botany or Zoology, provided the candidate Banking Biology

holds Master's Degree in both of them.

Zoology/Biology.

Applied Chemistry / Agriculture Chemistry / Botany Chemistry

Chemical Engineering / Physical Chemistry. History/ Public Administration/ Political

Science/ Law 36/ Pakistan Studies. Civics

Economics/Banking/Business Administration/ Commerce

Statistics/Mathematics/ M.BA.

Psychology.

Specified Branch of period of History/ Education General History

Political Science 37/Pakistan Studies.

Geology Geography **Economics**

Arabic/ Islamic History/ Islamic Culture. Home Economics

Islamiyat / Arabic / Islamic History Islamiyat

Any other branch or Period of History / Islamic Culture Islamic History

Islamiyat/ Islamic Culture.

Political Science/Civics. Physics Law Astronomy

Statistics / Mathematics

Applied /Pure Mathematics.

Botany/Bio-Chemistry/Zoology. Mirco Biology

Arabic / Urdu Persian Psychology

Mathematics, Physical Chemistry Philosophy

Physics History Branch of Political Science

Administration/Civics/Law 38/Pakistan Studies.

Philosophy

Psychology Persian/Arabic/Urdu/English.

Pushto Sociology/Psychology. Social Work Social Work/psychology.

Sociology

³⁵ The word "MBA" inserted vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated

The words "Pakistan Studies" added against the subject of Civics vide Notification No.PSC/

Acets/ Regulations/ 2003/4539 dated 12.02.2011.
The words "Pakistan Studies" added against the subject of General History vide Notification No.PSC/ Acets/ Regulations/ 2003/4539 dated 12.02.2011.

The words "Pakistan Studies" added against the subject of Political Science vide Notification No.PSC/ Accts/ Regulations/ 2003/4539 dated 12.02.2011.



Statistics - Urdu

Mathematics

Persian/Arabic/ Pushto/ English. Entomology/Botany/Bio-Chemistry.

Zoology English

Arabic./Urdu/Persian / Pushto.

Note: Diploma / Degree not specifically listed above shall be decided by the Commission on the basis of academic relevance.

- (l) ³⁹[Marks for Hifiz-ul-Quran will be awarded after having tested the proficiency of the candidate during the interview.]
- (m) Experience marks shall be awarded only in those cases where experience forms part of the requisite qualifications. While awarding experience marks, the period of minimum requisite experience shall be deducted and thereafter one mark per year shall be awarded for additional experience upto five years. In case additional experience exceeds the limit of five years then the credit thereafter shall be one mark for two completed years. However, in the case of Teaching / Specialist posts in the medical profession involving experience, one mark per year shall be allowed after the requisite postgraduate qualification. The experience acquired before post-graduation for such category of post, shall count only for the purpose of eligibility.
 - (n) The fraction of experience less than one complete year shall be ignored.
 - (o) The marks obtained in screening test / ability test shall be counted only for shortlisting purpose.

³⁰ Clause (I) of Regulation 29 substituted vide Notification No. KPSC/ B&A-52 / 2003/ 24561-72 dated 12.03.2014.





PART - VIII

EXPERIENCE

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- 30. When experience is laid down as a part of qualification the following principles shall be followed in determining the experience: -
 - Rules, prescribed experience means the experience gained in line in a regular full time paid job acquired after obtaining the prescribed qualification. Period spent on studies whether inside or outside the country during service except the period in acquiring Ph.D or M. Phil in the relevant field will be excluded from the claimed length of experience. In the case of Teaching posts where M.A. M.Ed and M.A. B.Ed are the minimum qualification the teaching experience will be counted after acquiring Master Degree in one of the general subjects or M.Ed. The period spent on acquiring teaching degree like M.Ed or B.Ed will be excluded as a study period if acquired during the service or required experience after Master Degree.

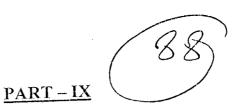
Associate professor/ Professor etc in Government Colleges where the minimum qualification is M. Phil / Ph. D the teaching / research experience shall be counted from the date the candidate joined the post of Lecturer / Research Assignment on the basis of Master Degree irrespective of the fact that the candidate improved his/ her qualification during the service or otherwise.

- (2) Experience gained during appointment on adhoc or contract basis or in officiating capacity shall be counted towards eligibility.
- (3) Period of practical training undergone by a candidate for becoming eligible for the award of actual Degree shall be counted as Experience, if such experience has been gained after and not during the academic session.
- (4) Experience gained in a recognized institution shall be taken into consideration if it is supported by valid documentary proof.

⁴⁰ Proviso to Clause 1 of Regulation 30 inserted vide Notification No. PSC/ PA/ Reg/04 dated 16.09.2004.



(5) The experience gained as a General Duty Medical Officer in the Armed Forces will be counted only in Surgery and Medicine in the ratio of 50:50.



31. <u>ADVISORS</u>

- (1) The department concerned shall be asked to send an advisor to assist in the Viva-Voce as Departmental Representative. However, the Commission can also call the Departmental Representative directly to maintain confidentiality of the name of advisor:
- Ordinarily an Additional Advisor as Subject Specialist shall also be called from the Universities / Colleges / Institutions / Autonomous Bodies directly or through the Head of the Institution.
- Letters inviting the advisors shall be issued at least a week before the date of the interview. In case the advisor(s) is / are unable to assist the Commission on the date fixed for the interview the Commission may conduct the interviews in the absence of either or both if in the opinion of the Commission such absence is not likely to affect the assessment of the candidates. Their absence will not vitiate the proceedings of interviewing board.
- (4) The Commission will maintain a list of advisors consisting of Retired / Inservice Officers of the Universities / Colleges / Institutions / Autonomous Bodies for its use any time at the discretion of the Commission.
- (5) The Advisors will not participate in the interview, if one or more than one of their relatives is appearing in the said interview.

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PART - X

32. INTERVIEWS.

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- Ordinarily all candidates selected for interview shall appear in person before the Commission. The candidates from abroad may, however, be considered on paper qualifications, provided they possess distinctly higher qualifications than the minimum prescribed for the post and the credentials of such person are known either to the Departmental Representative / Subject Expert.
- (2) When a near relative of the Chairman or a Member, is being interviewed he shall not be present during the interview of such candidates.
- (3) An application for a change in the date of interview received from a candidate before such date shall be decided by the Member Incharge on merit. However, a candidate who absents himself without submitting such an application shall unless good reasons are shown to the satisfaction of the Commission, be marked absent.
- (4) ⁴¹[] When all the candidates called for a particular date have been interviewed, the Commission shall determine the final grades of the candidates based on the assessment of the Advisors and the Member of the Commission. In case a unanimous decision cannot be taken, the majority decision of the Members will prevail. In the event of a tie, the Panel Chairman will exercise a casting vote.

⁴¹ The sentence "Member and Advisors shall record their marking independently" appearing in first sentence of Clause 4 of Regulation 32 deleted vide Notification No.PSC/ Acets/ Regulations/ 2003/4539 dated 12.02.2011.

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PART - XI

MERIT LIST / ZONAL ALLOCATION / RECOMMENDATION

33. MERIT LIST.

- (1) When all the eligible candidates who applied in response to a particular advertisement have been interviewed, the Director Recruitment / Director Examination as the case may be, shall prepare a merit list as per the marks indicated on the evaluation sheet and submit the case for the Commission's consideration.
- (2) Merit list shall be prepared keeping in view the aggregate marks secured by various candidates.
- (3) When two or more than two candidates have secured equal marks in aggregate the candidate who has secured higher marks in the interview shall be marked senior. In case the marks in aggregate and also the marks in the interview are the same, the candidate who is older in age shall be placed senior to the one who is younger. In case all the above-mer tioned factors are the same, marks obtained in the final examination of the prescribed qualification for the post shall be the deciding factor.
- (4) In the case of Competitive Examination the merit list shall be prepared in accordance with the laid down provisions of the syllabus of the respective service.

34. ZONAL ALLOCATION.

- (1) The zonal allocation of the vacancies shall be made in accordance with the zonal allocation formula wherever applicable.
- (2) Subject to Government Policy on zonal substitution, it is to be made, with prior approval of the Govt, due to deficiency of qualified candidates from the particular area(s). Such vacancies shall be filled in accordance with the proportionate ratio of the zones given in zonal allocation formula as contained in Regulation 3(a) from among the qualified candidates of other zones appearing on the merit list.

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35. RECOMMENDATIONS.

- (1) A decision about recommendations to be made shall be approved by the Commission irrespective of the fact as to whether the interviews had been conducted by a panel or by full Commission. After approval the Director concerned shall convey the recommendations to the concerned Department. The candidates recommended for appointment shall be informed of their selection within three days of the release of recommendation to the department. Non-adjusted and Non-marked candidates shall also be informed of their results.
 - (2) Where the experience forms part of the requisite qualifications, the recommendation of in-service candidates shall be conveyed provisionally subject to perusal of their ACRs by the Commission and finding these satisfactory
 - (3) (a) Where a large number of subjects / specialties are included in an advertisement, recommendations may not be pended till the finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-seseniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects. The chronological order of the recommendees shall not confer any right of seniority.
 - (b) The combined merit list shall be against a particular advertisement where the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason.



PART - XII

36. PANEL OF EXAMINERS / CONDUCT OF COMPETITIVE EXAMINATION.

- (1). The Commission shall maintain a panel of approved Examiners for various written examinations. The panel shall be reviewed periodically by the Chairman to ensure that a sufficient number of competent Examiners are available on the panel.
- (2) The Examiners for various examinations shall be appointed from the approved panel by the Chairman / Members authorized by the Commission in this behalf. As far as possible the answer sheets will be evaluated by the examiners who had prepared the question papers. In case the appointed examiner is unable to mark the papers for certain reasons then the ⁴²[Chairman] in its discretion may appoint another examiner from the approved panel.
- (3). There shall be no rechecking, reevaluation and reappraisal of the awarded marks and score once given on the answer sheet by the examiner shall be final. However, where some answer is left unmarked or an arithmetical mistake made by the examiner is noticed, necessary rectification of the mistake shall be made by the same examiner.

37. CONDUCT OF COMPETITIVE EXAMINATIONS.

- (1). The Director Examinations shall be the overall incharge of the examinations including appointment of the supervisory staff for different examinations and shall ensure that the examinations are conducted in accordance with the laid down instructions of the Commission.
- (2). A Member or an Officer of the Commission shall be designated as incharge of an examination center / centers. He shall be issued brass seals for each center for sealing the canvas bags in which the scripts are placed.
- (3). The brass seals shall be delivered to the examination center under the supervision of the Member / Officer. At the end of examination, these will be promptly collected. If there are two

⁴² The word "Commission" replaced by the word "Chairman" vide Notification No.PSC/ PA/ Reg/02 dated 31.01.2004:

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papers in a day, the scripts of the morning papers must be sealed immediately at the end of the examination. After completion of the After Noon's paper, the canvas bags shall be sealed and the scripts delivered to the Director of Examination or his representative.

- (4). The seals shall remain in the custody of the Member / Officer incharge till the scripts are dispatched to the examiners concerned.
- (5). The canvas sealed packets / bags shall be opened by the Chairman or Member Incharge. These will be embossed in his presence and the fictitious numbers marked on the scripts. The roll number slips duly marked with the fictitious numbers shall be placed in an envelope and sealed. The sealed envelope shall be delivered to the Chairman, and the answer book handed over to the Registrar Examinations.
- (6). The Registrar Examinations shall be responsible for checking and transmission of the scripts to the Examiners.
- (7). The Registrar Examination shall deliver the sealed question papers to the Member / Officer Incharge of the center. The Member / Officer Incharge shall arrange delivery of the sealed question papers to the examination centers under his own supervision.
- (8). During the examination, the Member / Officer incharge shall arrange to get the scripts sealed with his special rubber stamp. If the number of centers are such that stamps cannot be affixed in every center it may be done as is possible. It may be ensured that in a center which is selected for this purpose scripts of all the examinees be stamped as far as possible.
- (9). The respective representatives of the Commission appointed in various examination halls shall be responsible to deliver the scaled canvas bags to the Director Examination or his representatives if the Examination is held locally. In the case of outstation examination, the sealed bags shall be handed over to the concerned Member/ Officer who may deliver the same to the Examination Section on his return.
- (10). The Director Examination shall maintain a complete record of each paper on Form PSC.23.

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- (11). Ordinarily there shall be no change of Examination Centre. However, in order to avoid hardship the Chairman may authorize change of centre in exceptional cases.
- (12). Where candidate suffers from a disability which renders him / her unable to write, may apply to the Commission duly supported with the disability certificate before the written examination for the arrangement of an amanuensis. The Commission shall provide the amanuensis from the office who shall be of lower grade of education than the candidate.
- Answer books of candidates will be retained in the office of KP PSC for one year after recommendations against the posts are issued and thereafter these will be destroyed. Similarly, application forms/ copies of documents of non-selected candidates shall also be destroyed after one year of the issuance of recommendations. Any query relating to their answer books or application forms should be made by the candidates within the specified period, thereafter, no request in this regard shall be entertained. However, answer books or applications forms/ copies of documents of candidates wherein a query or an enquiry or a court case is pending shall be kept on record till final disposal of the query/ enquiry/ court case.

⁴³ Clause (c) of Regulation 37 inserted vide Notification No. KPSC/ B&A-52 / 2003/ 24561-7? dated 12.03.2014.



PART - XIII

38. RULES OF PROCEDURE

- (1). The decisions of the Commission shall be by a majority of votes of the Members present and in the case of tie, the Chairman shall have, a second or casting vote.
- (2). If the Chairman is unable to be present at a meeting of the Commission, the next senior Member shall preside over the meeting with all the powers of the Chairman and any decision taken in that meeting shall be valid.
- (3). The quorum for a meeting of the Commission shall be four but the Chairman may adjourn any business at a meeting if he is of the opinion that it cannot conveniently be transacted owing to the non-attendance of any Member.
- (4). The Proceedings of the Commission shall not be invalidated by the reasons of any vacancy in the office of the Chairman or other Member.
- (5). All decisions of the Commission shall be recorded in such a manner as the Commission may direct. It shall be open to any Member who dissents from a decision to record his dissent and, if he thinks fit, his reasons for dissenting.
- (6). Whenever the Commission is required to give advice on a policy matter or to forward proposals the decision of the Commission shall be communicated in a letter signed by the Secretary. Neither the fact nor the grounds for dissent by any Member shall be communicated unless the Commission so directs.
- (7). The Chairman or, in his absence, the Senior Member present may deal with any matter requiring immediate action. Such action shall be reported to the Commission as early as possible.
- (8). The Commission may refer any matter to an individual Member or to a Committee consisting of Member and any other persons, the Commission may appoint, for consideration and report to the Commission.





- (9). (a) The Commission may, subject to such directions as it thinks fit, delegate to a Committee constituted from among the Members, any of its functions.
 - (b) Every such Committee shall consist of not less than two Members.
 - (c) The decision of the Committee shall be communicated to the Chairman who shall refer it to the Commission for final decision.
 - (d) For the purpose of interview, the Commission may work in Panels as constituted by the Chairman.
 - (e) The Panel shall normally be comprised of not less than two Members of the Commission. However, in emergency or extreme load of work a single Member Panel can also be constituted. In addition, as far as possible, two advisors i.e. one subject specialist and one departmental representative may assist the Panel during the interview for posts in PBS-16 and above while for posts in BPS-11 to BPS-15 only departmental representative will be associated during the interviews, but where necessary, subject specialist may also be associated.
 - The panel of interview for the posts of PMS/ ETO, Civil Judges shall be three Members including the Chairman and for other BPS-18 and above posts, at least two Members of the Commission will be on the panel. However, before, interview, psychological/ aptitude test for recruitment against the posts of PMS/ ETO and Judicial Officers shall be compulsory.
 - (10). When the office of the Chairman becomes vacant through death, resignation, completion of terms of office, or otherwise, the senior-most Member shall exercise all the powers and functions of the Chairman until the vacancy is duly filled in.
 - (11). If the Commission desires to call for any record or report or information which may, in their opinion, be necessary to enable them to discharge their function, they shall address the Secretary to the Government of the Department Concerned.

⁴⁴ Sub Clause (f) of Clause 9 of Regulation 38 deleted vide Notification No. PSC/ Regulation /2003/ 4539 dated 12.02.2011 but re-inserted vide Notification No.KPSC/ B&A-52/ 2003 dated 15.11.2011.





- (12). When a file is to be circulated for obtaining the decision of the Commission it shall be put up first to Member-in-Charge who shall examine it and record his observations if any, and then mark it to the other Members of the Commission in such a way that it moves from Junior Members to Senior Members.
- (13). If a Member other than the Member-in-Charge wants the office to add some other information / documents to the case, he shall send the case through the Member Incharge.
- (14). Where the decision taken by a Member is contrary to any Regulation, Government instructions or an established practice of the Commission in the opinion of respective Head of the Wing, the matter shall be brought to the notice of such Member and if he dis-agrees with the office views it shall be brought to the Chairman's notice for taking such action as he may deem proper provided where an interpretation of rule / regulation is involved the matter shall be referred to the Commission.
- (15). In matters for which no provision exists in these rules the Chairman may regulate its proceedings in a manner as he thinks fit.

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PART - XIV

39. REPRESENTATION.

Representation addressed to the Commission shall be decided by the Commission on merit.

40. A MENDMENT IN THE REGULATIONS.

(a) An amendment or addition to the regulations shall be approved by the full Commission. Such amendments or additions shall have prospective effect.

RELAXATION IN REGULATIONS.

(b) Any of the above regulations may be relaxed by the Commission to avoid hardship provided such relaxation does not amount to violation of any law, rules or Government Orders.

41. ISSUANCE OF STANDING ORDERS / PROCEDURAL INSTRUCTIONS

The Commission for the conduct of its day-to-day business may issue standing orders / procedural instructions in respect of the matters not explicitly covered under these Regulations.

BY ORDER OF THE KHYBER PAKHTUNKHW'A PUBLIC SERVICE COMMISSION